

# 2023 PRI Report

2023 PRI Reporting Framework

# Terms and Conditions

## 1. Introduction

**1.1 The following terms and conditions form the Agreement agreed between your corporate entity ("You", "Your") and PRI Association ("PRI", "We," "Us", "Our"),** Registered Company No: 720794, Registered Office: 5th Floor, 25 Camperdown Street, London, UK, E1 8DZ in relation to the use of, and submission of data to, the Reporting Tool.

**1.2 By clicking on the button marked "I Accept" before You access the Reporting Tool on Our website, You agree to be legally bound by this Agreement.**

**1.3 The definitions that apply in the Agreement are:**

Terms	Definitions
" <b>Assessment Peering Data</b> "	means aggregate data compiled from a group of at least 8 signatories which compares the signatories based on various categories including geography, region, country, asset class, AUM group and year of becoming a PRI signatory.
" <b>Assessment Report</b> "	means a report accessed via the Data Portal showing Your score for each Indicator calculated based on PRI's own proprietary assessment methodology, which assesses data collected through the Reporting Framework and a comparison against Your peers.
" <b>Confidential Information</b> "	<p><b>means any information of a confidential nature obtained under this Agreement, or relating to this Agreement, including information of any kind relating to business activities, practices, finances, strategic plans, ideas, designs and innovations, but not including information:</b></p> <ol style="list-style-type: none"><li><b>1. in the public domain (otherwise than by breach of this Agreement);</b></li><li><b>2. in the lawful possession of the receiving party before the date of this Agreement (other than through liaison between the parties before and in anticipation of this Agreement); or</b></li><li><b>3. obtained from a third party free to divulge it.</b></li></ol>
" <b>Controller</b> "	has the meaning given in the Data Protection Legislation.
" <b>Data Portal</b> "	means a cloud-based platform used by the PRI to host Transparency Reports and Assessment Reports.

"Data Protection Legislation"	means all applicable national, international and local laws, rules, regulations or directives concerning data protection, information security, cyber security, data privacy and data breach notification including, without limitation and where applicable, the Data Protection Act 2018 and the UK GDPR, each as amended from time to time and any successor laws, rules, legislation, regulation or directives.
"De-listing" or "De-listed"	means the process of ceasing signatory status. Unless PRI gives special dispensation, signatories meeting the eligibility requirements (specified in the PRI Association Rules) that fail to complete and submit a response to the Reporting Tool will be De-listed.
"Indicators"	<p><b>means a question designed to obtain specific information from You on elements of Your responsible investment policies/activities, or other information necessary to drive the logic of the Reporting Framework (for example, % assets under management in Private Equity), or to profile You for peering and contextualisation purposes.</b></p> <p><b>Indicators fall into two categories:</b></p> <ul style="list-style-type: none"> <li>○ <i>Core</i>: Mandatory to report and disclose. This remains at PRI's discretion but unless We give explicit instructions otherwise, You must complete these indicators and PRI will disclose their responses on the PRI website.</li> <li>○ <i>Plus</i>: Voluntary to report and disclose. You can decide whether to respond and can instruct PRI to treat the information as public or private by making a selection in the Reporting Tool.</li> </ul>
"Intellectual Property Rights"	means all patents, trademarks, copyright, database and design rights (whether registered or not) and all other intellectual property rights (of every kind and nature however designated) whether arising by operation of law, treaty, contract, license or otherwise.
"Network Partners"	means third party organisations that work together with PRI to deliver the secretariat functions of PRI-led or PRI-supported investor initiatives.
"Net Zero Alliance or Initiative"	means the UN-convened Net Zero Asset Owner Alliance (AOA), a member-led initiative of institutional investors committed to transitioning their investment portfolios to net-zero GHG emissions by 2050, or the Net Zero Asset Managers Initiative (NZAM) a group of asset managers committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5 degrees Celsius.
"Personal Data"	has the meaning given in the Data Protection Legislation.
"Private Indicators"/ "private data set"	means Indicators and responses that You have instructed PRI not to publish through the Reporting Tool.
"Public Indicators"/ "public data set"	means all mandatory to disclose Indicators and responses as well as any additional Indicators and responses that You have instructed PRI to publish through the Reporting Tool.
"Reporting Framework"	means a set of questions and content developed by PRI which is hosted on the Reporting Tool and through which PRI collects information on responsible investment activities. All references to the Reporting Framework under this Agreement refer to the 2023 version of the framework.
"Reporting Tool"	means a third-party cloud-based platform licensed to PRI that hosts the Reporting Framework.
"Transparency Report"	means a report accessed via the Data Portal showing Your responses to Indicators provided through the Reporting Tool.

## 2. Obligations of PRI

### 2.1 PRI will:

#### *Publishing Data*

**2.1.1 publish Public Indicators and Your response to such Indicators in accordance with this Agreement;**

**2.1.2 handle Private Indicators, Your response to such Private Indicators and Your Assessment Reports in accordance with this Agreement and, in particular, PRI shall not publish such responses unless authorised by You or under this Agreement;**

*Reporting Tool*

**2.1.3 make available the Reporting Tool in accordance with this Agreement; and**

**2.1.4 take reasonable steps to address any technical problems associated with the Reporting Tool whenever reported by You (or otherwise identified by Us) as soon as is reasonably practical.**

**2.2 PRI shall be entitled to generate data on functionality and usage of the Reporting Tool and to obtain information on the most commonly searched, shared, requested and viewed reports.**

**3. Your obligations**

**3.1 You will:**

*Your submission*

**3.1.1 use Your best endeavours to ensure the accuracy of all information submitted;**

**3.1.2 complete the Reporting Tool on the first anniversary of becoming a signatory and on each subsequent anniversary. During the first year of membership, completion of the Reporting Tool is voluntary but if You wish to complete the Reporting Tool, You may request that Your Transparency Report is kept private (however in these circumstances PRI may use data from such Transparency Report in aggregate form to produce charts and reports);**

*Your Assessment Report and Transparency Report*

**3.1.3 review the content of Your Assessment Report and/or Transparency Report before sharing either of these; and**

*Complaints*

**3.1.4 make any formal complaint in accordance with any reasonable procedure as notified by PRI.**

**4. Data use and sharing**

**4.1 Public Indicators.**

**4.1.1 Your response to Public Indicators will be made publicly available in the form of the Transparency Report hosted on the PRI website after Your response to the Reporting Tool is submitted. PRI retains the right to publish Your responses to Public Indicators on the Data Portal.**

**4.1.2 PRI retains the right to delay or refuse publication of Your Transparency Report if PRI has reasonable doubt about the accuracy or veracity of the information provided by You. PRI may conduct basic validation of reported data, but this does not constitute formal verification of responses.**

**4.1.3 PRI retains the right to publish a shortened version of Your Transparency Report changing the indicator-response structure but not the meaning.**

**4.1.4 PRI shall use the 'assets under management' figure that You provide to PRI no later than 31 March in any given year (regardless of whether You have formally submitted Your report for that year) in order to calculate Your annual fee for the period starting on 1 April of that same year. If PRI subsequently determines that Your annual fee is higher than the amount that PRI has invoiced, PRI shall be entitled to issue another invoice for the difference and You shall promptly pay such invoice.**

**4.1.5 PRI will be entitled to (both during and after the term of this Agreement):**

**4.1.5.1 retain Your Transparency Report;**

**4.1.5.2 retain Your responses to the Reporting Tool and, subject to the restrictions in clause 4.3.1, use them for its own purposes, including research, internal**

analysis and the creation of derivative works;

4.1.5.3 retain Your response to Your Public Indicators and Private Indicators for reanalysis and republication in part or in whole to third party organisations. These organisations will be required to adhere to PRI's data use and security policies;

4.1.5.4 charge users a fee for any dataset comprised of responses to the Public Indicators from all or some signatories;

4.1.5.5 use the public data set and private data set as well as Assessment Reports and Assessment Peering Data for PRI's accountability efforts in establishing minimum criteria that can result in De-listing signatories who do not meet these and for publishing the leadership board;

4.1.5.6 with Your permission, amend Your completed and/or submitted responses to the Reporting Tool; and

4.1.5.7 omit Your public responses from bespoke analysis if the information provided by You is deemed unusable or Your response contradicts another one of Your responses. Where You have provided contradictory responses, PRI (in its sole discretion) reserves the right to use whichever response is the most appropriate.

## 4.2 Sharing of the data by You

4.2.1 You may share Your Transparency Report and Assessment Report in any way you see fit. However, when doing so any references to Your scores should be accompanied by the context of Your full Assessment Report (or a reference to the module the Assessment Report refers to). Should You decide to share your Assessment Report or Transparency Report, the PRI accepts no responsibility for errors or mistakes contained in Your Assessment Report and Transparency Report.

## 4.3 Private Indicators

4.3.1 Where You have instructed PRI to treat Your response to an Indicator as private, subject to clause 4.3.6, We shall not disclose Your response to any third party without Your explicit authorization. You hereby authorize Us to share private data sets with academics who deliver research on Our behalf subject always to such academics being bound by confidentiality obligations.

4.3.2 If You are reporting on a voluntary basis, You may instruct PRI to keep your entire response private, including your responses to mandatory Indicators. This must be done in the relevant area in the Reporting Tool.

4.3.3 Your response in the Reporting Tool may be retained in PRI databases indefinitely.

4.3.4 PRI may use an aggregate data set of all responses, including Your responses to Private Indicators, for internal and external purposes aligned to PRI's objectives including improving the Reporting Tool, implementation support tools and assessment methodology.

4.3.5 PRI may publish reports or analysis based on signatories' responses to both the Public Indicators and Private Indicators. Such reports or analysis will not directly identify Your 'private' data (unless You have provided Your prior consent to PRI).

4.3.6 If You are a member of a Net Zero Alliance or Initiative, PRI will share Your responses to specific Indicators (as outlined in PRI's net zero reporting guidance documents available on the Investor Reporting Framework section of the PRI website) with the Network Partners of such alliances or initiatives, for the purposes of fulfilling Your progress reporting obligations as required annually by those alliances or initiatives.

## 4.4 Results of Assessment

4.4.1 PRI will not publicly disclose individual Assessment Reports.

4.4.2 The Assessment Reports do not constitute investment advice. The Assessment Reports can be solely regarded and interpreted as an indication of resources allocated to responsible investment, a learning tool for identifying areas of strengths and weaknesses in responsible investment incorporation as well as a supplement for dialogue between PRI signatories and their clients and beneficiaries.

4.4.3 During the reporting year, PRI may change the assessment methodology at any time before You receive Your assessment results.

4.4.4 PRI may store the results of Your assessment indefinitely. To improve benchmarking, PRI may revise the assessment results depending on refinements and improvements in the methodology.

**4.4.5 PRI may publish aggregate analysis of the assessment results.**

**4.4.6 If You have not completed and submitted responses to the Reporting Tool by the established deadline, PRI shall not be obliged to provide an Assessment Report to You.**

**4.4.7 The assessment is based on information reported directly by You and on an assessment methodology. The underlying information has not been audited by PRI or any other party acting on its behalf. While every effort has been made to produce a fair representation of performance, no representations or warranties are made as to the accuracy of the information presented, and PRI accepts no responsibility or liability for damage caused by use of or reliance on the information contained within any report.**

**4.4.8 The Assessment Peering Data can be used for PRI's accountability efforts in establishing minimum criteria that can result in De-listing signatories who do not meet these and for publishing the leadership board.**

## **5. Intellectual Property**

**5.1 PRI (and where relevant its licensors) retains all Intellectual Property Rights in:**

**5.1.1 the Reporting Framework;**

**5.1.2 the Reporting Tool;**

**5.1.3 the Data Portal;**

**5.1.4 Your Transparency Report; and**

**5.1.5 Your Assessment Report.**

**5.2 To the extent Intellectual Property Rights subsist in any of Your responses to the Indications, You hereby grant PRI a transferrable, sublicensable, worldwide, royalty-free licence to use such Intellectual Property Rights to exercise Our rights to use and share such data under this Agreement.**

**5.3 PRI hereby grants to You a non-transferable, worldwide, royalty-free licence to access the Reporting Tool (and Your responses which are made available to You through the Reporting Tool) during the term of this Agreement for Your internal business purposes only and without the right to sub-licence.**

**5.4 PRI retains the right to terminate in whole or in part the licence in clause 5.3, upon reasonable notice, if You are undertaking activities deemed to be of material concern to PRI.**

**5.5 Subject to the licence in clause 5.3, nothing in this Agreement will operate to transfer to You any Intellectual Property Rights (including in any source code, content and design) or any materials, reports or content provided to You by PRI under this Agreement. You shall not copy, amend or use any of the works listed in clause 5.1 other than as permitted by this Agreement.**

**5.6 You shall not, under any circumstances, have any access to the underlying tools (e.g. features, configurations, software/ cloud platforms and methodologies) of PRI and PRI's licensors.**

**5.7 Nothing in this Agreement will operate to transfer to PRI any Intellectual Property Rights in Your name and logo nor transfer to You any Intellectual Property Rights in the PRI name or logos. You acknowledge that all Intellectual Property Rights in the PRI names and logos (and any associated goodwill) belong to and shall remain the property of PRI. PRI acknowledges that all Intellectual Property Rights in Your name and logo (and any associated goodwill) belong to and shall remain Your property.**

**5.8 You may not bring, defend or settle any action in relation to the PRI name or logos. Where PRI is involved in any claim or proceeding in relation to the PRI name or logos, You will give your reasonable co-operation to PRI. PRI may not bring, defend or settle any action in relation to Your name or logo. Where You are involved in any claim or proceeding in relation to your name or logo, PRI will give its reasonable co-operation to You**

## **6. Confidentiality**

**6.1** The recipient of Confidential Information shall use reasonable care to protect against the disclosure of the disclosing party's Confidential Information and not make it available to any third party, except that PRI may disclose Confidential Information You disclose to Us to third party contractors carrying out services on our behalf and who are subject to appropriate confidentiality obligations and either party may disclose Confidential Information in accordance with clause 6.2, or use it for any purpose other than as set out in this Agreement.

**6.2** The recipient may disclose Confidential Information, to the extent required by applicable law, if requested by a governmental or regulatory authority. Where practically possible and permitted by law, the disclosing party shall give the other party advance notice and may take into account the reasonable requests of the other party in relation to the disclosure.

## **7. Termination**

**7.1** This Agreement will commence when You click the "I Accept" button, thereby accepting the terms and conditions of this Agreement, and will remain in force unless and until terminated in accordance with this Agreement.

**7.2** Either party may terminate this Agreement upon giving reasonable notice to the other (such notice to be no less than 14 days) if:

**7.2.1** in the case of remediable breaches, the other party repeatedly breaches any of the terms of this Agreement or is in breach of any material term of this Agreement, and fails to remedy such breaches, having been given reasonable notice (such notice to be no less than 14 days) to remedy the breach; or

**7.2.2** in the case of irremediable breaches, the other party repeatedly breaches any of the terms of this Agreement or breaches any material term of this Agreement.

**7.3** PRI may terminate this Agreement for convenience on 14 days' written notice to You, if You have been De-listed or if you fail to provide information as reasonable requested by PRI.

**7.4** You may terminate this Agreement by 14 days' written notice to PRI if, acting reasonably, You consider that material changes to this Agreement, made by PRI and notified to You on the PRI website, are materially detrimental to Your business.

**7.5** The provisions of this Agreement will continue to apply following termination of this Agreement (however terminated) so far as may be necessary to give effect to the rights and remedies of You and PRI and which by their nature continue, such as the provisions regarding confidentiality, liability, intellectual property, applicable law and jurisdiction.

## **8. Limitation of Liability and Indemnity**

**8.1** Nothing in this Agreement shall limit or exclude either party's liability for death or personal injury caused by negligence, fraud or fraudulent misrepresentation, any liability under the indemnity in clause 8.4 or any matter which may not be limited or excluded under applicable laws.

**8.2** Subject to clause 8.1, neither party will be liable under or in connection with this Agreement whether in contract, tort (including negligence), breach of statutory duty or otherwise for any: (i) loss of profits, business, business opportunities, revenue, turnover, reputation or goodwill; (ii) loss or corruption of data or information; (iii) loss of anticipated savings or wasted expenditure; or (iv) indirect, incidental, consequential, exemplary, punitive or special damages.

**8.3** Subject to clause 8.1, PRI's total aggregate liability arising under or in connection with this Agreement whether in contract, tort (including negligence), breach of statutory duty or otherwise shall not exceed the sum of £1,000 (one thousand pounds).

**8.4** PRI shall not be responsible for the accuracy of any data published by You in Your Transparency Report. You shall indemnify PRI against any loss, cost or damage relating to or arising directly or indirectly as a result of PRI's hosting or use of any data inputted by You in the Reporting Tool, including any loss, cost or damage relating to the data inputted being inaccurate, infringing the Intellectual Property Rights of any third party or infringing any individual's rights under Data Protection Legislation.

## **9. Personal Data**

**9.1 The parties acknowledge that the factual arrangements between them dictate the classification of each party in respect of the Data Protection Legislation. Notwithstanding the foregoing, the parties envisage that each party shall be an independent Controller with respect to any Personal Data shared by You with Us under this Agreement.**

**9.2 You will only provide Personal Data in your responses to the Indications where necessary and you shall ensure that you have legitimate grounds under Data Protection Legislation to share such Personal Data with PRI for the uses envisaged under this Agreement.**

**9.3 You will inform any individuals whose Personal Data is shared with Us, in a manner compliant with Data Protection Legislation, of the purposes of their data being processed by PRI and direct them to PRI's privacy policy at the URL <https://www.unpri.org/privacy-policy>.**

## **10. General**

**10.1 PRI may subcontract its obligations under this Agreement to a third party. Except as expressly stated in this Agreement, You may not assign, subcontract, sublicense or otherwise transfer any rights or obligations under this Agreement or any part thereof without the prior consent in writing of PRI.**

**10.2 This Agreement is the entire agreement between the parties in relation to its subject matter. No variation of this Agreement will be effective unless agreed in writing signed by or on behalf of the parties.**

**10.3 This Agreement is not intended to nor will it create any agency, partnership or joint venture. Neither party will hold itself out as being entitled to represent or bind the other party in any way.**

**10.4 This Agreement is governed by and will be construed in accordance with the law of England and the parties irrevocably submit to the exclusive jurisdiction of the courts of England and Wales.**

**10.5 Notices from You to Us must be given by email to the appropriate address ([reporting@unpri.org](mailto:reporting@unpri.org)) and shall be deemed given when actually received by Us provided that if received outside of business hours, notice shall be deemed given at 9:00am on the next business day.**

**10.6 Notices from Us to You will be given to the email account through which You have received Your login for the Reporting Tool unless You provide a new email account to Us in writing.**

**10.7 Except where the context requires otherwise:**

**10.7.1 the singular includes the plural and vice versa; a reference to one gender includes all genders; words denoting persons include a natural person, corporate or unincorporated body (whether or not having separate legal personality); and**

**10.7.2 any words that follow 'include', 'includes', 'including', 'in particular' or any similar words and expressions shall be construed as illustrative only and shall not limit the sense of any word, phrase, term, definition or description preceding those words.**

I accept the Terms before commencing the 2023 survey.



Indicator ID <b>SLS 1</b>	Dependent on:	N/A	Sub-section <b>Senior Leadership Statement</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

## Section 1. Our commitment

**PUBLIC**

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

At Nykredit, and subsidiary Sparinvest, responsible investment lies at the core of our strategy. We want to be a responsible financial provider for people and businesses all over Denmark. Nykredit is committed and uniquely positioned to help solve the common challenges faced by society. Nykredit's ambition is to invest in ways that create value for our customers and benefit society. The world is facing major social and environmental challenges, and together with our customers, we will support sustainable development and contribute to realizing the UN Sustainable Development Goals and limiting climate change.

Nykredit believes that sustainable investment is about driving change. When investing Nykredit applies sustainability assessments to understand the risks and opportunities related to ESG factors. Our approach to sustainability feeds directly into our stewardship programme. Our voting principles incorporate climate and other ESG considerations. We engage with companies for various reasons, including norms-related, climate change, other thematic engagements, and company specific issues. Nykredit seeks to support our investee companies in their transition towards a net zero emission economy, and we aim to engage with companies responsible for a significant share of total emissions from our portfolios to ensure that they set appropriate targets and align with the 1.5 degree targets of the Paris Climate Agreement. We have dialogue with various holdings, while our engagement includes both direct engagements by Nykredit or Sparinvest; collaborative engagements via initiatives such as Climate Action 100+ and the Net Zero Engagement Initiative; and engagements led by service providers. We screen issuers for breaches of international norms, and for companies violating norms we aim to encourage remediation of the violation and avoidance of recurrence. Where engagement is not successful, or where improvement is assessed to be unrealistic, companies can be excluded from investment; however, together with other investors, we often share successful engagements.

Nykredit has set ambitious climate targets for our investments to be aligned with the transition required to meet the objective of the Paris Climate Agreement. In 2021, Nykredit joined the Net Zero Asset Managers Initiative, and we are now committed to making the Group's investment portfolio climate neutral by 2050. Later that year, Nykredit published an ambitious target of reducing the emission intensity across asset classes by 60% from 2020 to 2030. In 2022 Nykredit has joined the Science Based Target Initiative (SBTI) and is committed to send a target to validation within the next two years. But ambitious targets do not fulfil themselves. We are taking various measures to ensure the long-term decarbonisation of Nykredit's investments:

- Stewardship activities relating to climate, including fossil fuel companies and high-emitting sectors
- More green investments
- Climate-related benchmarks
- Exclusion of companies in certain sectors such as the energy sector, without a reliable, Paris-aligned transition plan (increasingly stringent as time progresses)

#### Making Every Investment Useful

To deliver on our ambition of being Denmark's responsible wealth manager, there are two questions we will always ask ourselves:

- Are we building sustainable value for our clients and business partners?
- Are we creating real value for the world that surrounds us and in what way?

We seek solutions addressing both these perspectives, and we think this helps generate competitive risk-adjusted returns. We want to create good results for our clients and at the same time take considerable responsibility for the society we are part of.

## Section 2. Annual overview

PUBLIC

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
  - refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policymakers
  - collaborative engagements
  - attainment of responsible investment certifications and/or awards

Nykredit Asset Management has set the ambition that 100% of the assets under management should be invested in line with NZAM methodology, and we use the NZIF framework to implement this. Furthermore, the emission intensity must be down by 60% by 2030 (from a 2020 baseline). Against this backdrop, Nykredit Asset Management's approach to investing in fossil fuel companies was updated and refocused in 2022. Nykredit is following the guidelines of the International Energy Agency (IEA) on transition laggards and in principle excludes companies that derive more than 5% of revenues from extraction of thermal coal and companies that have not set a transition plan. We also exclude companies that derive more than 5% of revenues from unconventional oil and gas and drilling in the Arctic. These exclusions help reduce climate risks in our investment portfolios. In addition to reducing the carbon footprint, they will also reduce the financial risks of investing in companies that are directly impacted by the green transition and have not set a transition plan.

As part of our ESG-related efforts we engage with companies that need to improve their practices. In H1/2022, Nykredit approached a North American cruise liner company, which has had difficulties complying with environmental regulations in recent years. Orders have been issued and claims have been lodged by third parties against the company via a supervisory authority appointed by the court. The company has strived to improve its environmental compliance systems. The company has strengthened its internal monitoring systems and made a long-term commitment to reach carbon neutrality by 2050. We will continue to monitor the company's progress in the environmental area. We have also engaged with the company Epiroc. The company is undergoing positive development, particularly in the area of communication and clarification of sustainability initiatives. The company has also joined the Science Based Targets initiative (SBTi). In our dialogue with the company, we have underlined our wish for them to use "green" steel going forward. We will follow up on this issue with the company.

Nykredit participates in collaborative engagement through the Climate Action 100+ initiative, which seeks to influence the container shipping company Maersk to accelerate the speed and ambition of its green transition. On average, Maersk's emission intensity has decreased by 15% every year between 2018 to 2022, which is above the industry average. Maersk will launch its first carbon neutral liner vessel by 2023.

During 2022, we expanded our voting programme: previously, we aimed to vote all meetings in actively managed funds, and some prioritised meetings in passive funds, but during 2022 introduced the aim of voting all meetings across passive funds.

### Section 3. Next steps

PUBLIC

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Nykredit has joined the Science Based Target Initiative (SBTi), the highest standard for companies setting ambitious and binding reduction targets for their greenhouse gas emissions. Within two years, SBTi must approve Nykredit's specific climate action targets and milestones.

### Section 4. Endorsement

PUBLIC

**'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.**

**Note to signatories:** the PRI suggests wording in option (A) below to explain that the above endorsement relates only to the Senior Leadership Statement and not the entire PRI report. Signatories may use the text below by selecting option (A). Alternatively, signatories may select option (B) and adapt the text below or provide an entirely new text to suit their preferences and/or to align with any applicable legal requirements or norms in their respective jurisdictions.

Name

Michael Rasmussen

Position

CEO

Organisation's Name

Nykredit Realkredit Group

A

**'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework.**

**The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.**

B

Indicator ID <b>OO 1</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Reporting year</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

**PUBLIC**

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	<input type="radio"/> 01 <input type="radio"/> 02 <input type="radio"/> 03 <input type="radio"/> 04 <input type="radio"/> 05 <input type="radio"/> 06 <input type="radio"/> 07 <input type="radio"/> 08 <input type="radio"/> 09 <input type="radio"/> 10 <input type="radio"/> 11 <input checked="" type="radio"/> 12 <input type="radio"/> 13 <input type="radio"/> 14 <input type="radio"/> 15 <input type="radio"/> 16 <input type="radio"/> 17 <input type="radio"/> 18 <input type="radio"/> 19 <input type="radio"/> 20 <input type="radio"/> 21 <input type="radio"/> 22 <input type="radio"/> 23 <input type="radio"/> 24 <input type="radio"/> 25 <input type="radio"/> 26 <input type="radio"/> 27 <input type="radio"/> 28 <input type="radio"/> 29	<input type="radio"/> 01 <input type="radio"/> 02 <input type="radio"/> 03 <input type="radio"/> 04 <input type="radio"/> 05 <input type="radio"/> 06 <input type="radio"/> 07 <input type="radio"/> 08 <input type="radio"/> 09 <input type="radio"/> 10 <input type="radio"/> 11 <input checked="" type="radio"/> 12	<input type="radio"/> 2021 <input checked="" type="radio"/> 2022 <input type="radio"/> 2023

	<input type="radio"/> 30 <input checked="" type="radio"/> 31		
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Indicator ID <b>OO 2</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Subsidiary information</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 2.1</b>			

Does your organisation have subsidiaries?

**PUBLIC**

- (A) Yes
- (B) No

Indicator ID <b>OO 2.1</b>	Dependent on:	<b>OO 2</b>	Sub-section <b>Subsidiary information</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 2.2</b>			

Are any of your organisation's subsidiaries PRI signatories in their own right?

**PUBLIC**

- (A) Yes
- (B) No



Indicator ID <b>OO 4</b>	Dependent on:	<b>OO 3</b>	Sub-section <b>All asset classes</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

**PUBLIC**

*Provide the amount in USD. You may check the exchange rate of your currency to USD on the International Monetary Fund website.*

	Trillions	Billions	Millions	Thousands	Hundreds	USD
(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only	000	062	000	000	000	62000000000
(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]	000	000	000	000	000	0
(C) AUM subject to execution, advisory, custody, or research advisory only	000	000	000	000	000	0

Additional information on the exchange rate used: (Voluntary)

Indicator ID <b>OO 5</b>	Dependent on:	<b>OO 3</b>	Sub-section <b>Asset breakdown</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

**PUBLIC**

	<b>(1) Percentage of Internally managed AUM</b>	<b>(2) Percentage of Externally managed AUM</b>	<b>Total AUM percentage ((1) + (2))</b>
(A) Listed equity	35%	3%	
(B) Fixed income	55%	0%	
(C) Private equity	0%	1%	
(D) Real estate	0%	0%	
(E) Infrastructure	0%	1%	
(F) Hedge funds	5%	0%	
(G) Forestry	0%	0%	
(H) Farmland	0%	0%	
(I) Other	0%	0%	
(J) Off-balance sheet	0%	0%	
Total	95.00%	5.00%	

Indicator ID <b>OO 5.1</b>	Dependent on:	<b>OO 5</b>	Sub-section <b>Asset breakdown: Externally managed assets</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple</b>			

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

**PUBLIC**

	<b>(1) Listed equity</b>
(A) Active	100%
(B) Passive	0%
<b>Total Listed equity AUM (%)</b>	100

Indicator ID <b>OO 5.2</b>	Dependent on:	<b>OO 5, OO 5.1</b>	Sub-section <b>Asset breakdown: Externally managed assets</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>SAM 3, SAM 8</b>			

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

**PUBLIC**

	<b>(1) Segregated mandate(s)</b>	<b>(2) Pooled fund(s) or pooled investment(s)</b>	<b>Total</b>
(A) Listed equity - active	0%	100%	100.00%
(E) Private equity	0%	100%	100.00%
(G) Infrastructure	0%	100%	100.00%

Indicator ID <b>OO 5.3 LE</b>	Dependent on:	<b>OO 5</b>	Sub-section <b>Asset breakdown: Internally managed listed equity</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple</b>			

Provide a further breakdown of your internally managed listed equity AUM.

**PUBLIC**

(A) Passive equity	27%
(B) Active – quantitative	7%
(C) Active – fundamental	66%
(D) Other strategies	0%
Total	100.00%

Indicator ID <b>OO 5.3 FI</b>	Dependent on:	<b>OO 5</b>	Sub-section <b>Asset breakdown: Internally managed fixed income</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple</b>			

Provide a further breakdown of your internally managed fixed income AUM.

**PUBLIC**

(A) Passive – SSA	0%
(B) Passive – corporate	0%
(C) Active – SSA	5%
(D) Active – corporate	11%
(E) Securitised	84%
(F) Private debt	0%
Total	100.00%

Indicator ID <b>OO 5.3 HF</b>	Dependent on:	<b>OO 5</b>	Sub-section <b>Asset breakdown: Internally managed hedge fund</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 11</b>			

Provide a further breakdown of your internally managed hedge fund assets.

**PUBLIC**

(A) Multi-strategy	0%
(B) Long/short equity	0%
(C) Long/short credit	100%
(D) Distressed, special situations and event-driven fundamental	0%
(E) Structured credit	0%
(F) Global macro	0%
(G) Commodity trading advisor	0%
(H) Other strategies	0%
Total	100.00%

Indicator ID	Dependent on:	OO 5	Sub-section <b>Management by PRI signatories</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
OO 6	Gateway to:	N/A			

What percentage of your organisation's externally managed assets are managed by PRI signatories?

**PUBLIC**

*The percentage figure can be rounded to the nearest 5%.*

100%



Indicator ID <b>OO 7</b>	Dependent on:	<b>OO 5, OO 5.1, OO 5.3 FI</b>	Sub-section <b>Geographical breakdown</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How much of your AUM in each asset class is invested in emerging markets and developing economies?

**PUBLIC**

*The percentage figure should combine internally and externally managed assets. Markets are classified according to the IMF's World Economic Outlook.*

	<b>AUM in Emerging Markets and Developing Economies</b>
(A) Listed equity	<input type="radio"/> (1) 0% <input checked="" type="radio"/> (2) >0 to 10% <input type="radio"/> (3) >10 to 20% <input type="radio"/> (4) >20 to 30% <input type="radio"/> (5) >30 to 40% <input type="radio"/> (6) >40 to 50% <input type="radio"/> (7) >50 to 60% <input type="radio"/> (8) >60 to 70% <input type="radio"/> (9) >70 to 80% <input type="radio"/> (10) >80 to 90% <input type="radio"/> (11) >90 to <100% <input type="radio"/> (12) 100%
(B) Fixed income – SSA	<input type="radio"/> (1) 0% <input type="radio"/> (2) >0 to 10% <input type="radio"/> (3) >10 to 20% <input type="radio"/> (4) >20 to 30% <input type="radio"/> (5) >30 to 40% <input type="radio"/> (6) >40 to 50% <input type="radio"/> (7) >50 to 60% <input type="radio"/> (8) >60 to 70% <input type="radio"/> (9) >70 to 80% <input checked="" type="radio"/> (10) >80 to 90% <input type="radio"/> (11) >90 to <100% <input type="radio"/> (12) 100%
(C) Fixed income – corporate	<input type="radio"/> (1) 0% <input type="radio"/> (2) >0 to 10% <input checked="" type="radio"/> (3) >10 to 20%

	<ul style="list-style-type: none"> <li><input type="radio"/> (4) &gt;20 to 30%</li> <li><input type="radio"/> (5) &gt;30 to 40%</li> <li><input type="radio"/> (6) &gt;40 to 50%</li> <li><input type="radio"/> (7) &gt;50 to 60%</li> <li><input type="radio"/> (8) &gt;60 to 70%</li> <li><input type="radio"/> (9) &gt;70 to 80%</li> <li><input type="radio"/> (10) &gt;80 to 90%</li> <li><input type="radio"/> (11) &gt;90 to &lt;100%</li> <li><input type="radio"/> (12) 100%</li> </ul>
(D) Fixed income – securitised	<ul style="list-style-type: none"> <li><input type="radio"/> (1) 0%</li> <li><input checked="" type="radio"/> (2) &gt;0 to 10%</li> <li><input type="radio"/> (3) &gt;10 to 20%</li> <li><input type="radio"/> (4) &gt;20 to 30%</li> <li><input type="radio"/> (5) &gt;30 to 40%</li> <li><input type="radio"/> (6) &gt;40 to 50%</li> <li><input type="radio"/> (7) &gt;50 to 60%</li> <li><input type="radio"/> (8) &gt;60 to 70%</li> <li><input type="radio"/> (9) &gt;70 to 80%</li> <li><input type="radio"/> (10) &gt;80 to 90%</li> <li><input type="radio"/> (11) &gt;90 to &lt;100%</li> <li><input type="radio"/> (12) 100%</li> </ul>
(F) Private equity	<ul style="list-style-type: none"> <li><input type="radio"/> (1) 0%</li> <li><input checked="" type="radio"/> (2) &gt;0 to 10%</li> <li><input type="radio"/> (3) &gt;10 to 20%</li> <li><input type="radio"/> (4) &gt;20 to 30%</li> <li><input type="radio"/> (5) &gt;30 to 40%</li> <li><input type="radio"/> (6) &gt;40 to 50%</li> <li><input type="radio"/> (7) &gt;50 to 60%</li> <li><input type="radio"/> (8) &gt;60 to 70%</li> <li><input type="radio"/> (9) &gt;70 to 80%</li> <li><input type="radio"/> (10) &gt;80 to 90%</li> <li><input type="radio"/> (11) &gt;90 to &lt;100%</li> <li><input type="radio"/> (12) 100%</li> </ul>
(H) Infrastructure	<ul style="list-style-type: none"> <li><input type="radio"/> (1) 0%</li> <li><input checked="" type="radio"/> (2) &gt;0 to 10%</li> <li><input type="radio"/> (3) &gt;10 to 20%</li> <li><input type="radio"/> (4) &gt;20 to 30%</li> <li><input type="radio"/> (5) &gt;30 to 40%</li> <li><input type="radio"/> (6) &gt;40 to 50%</li> <li><input type="radio"/> (7) &gt;50 to 60%</li> </ul>

	<ul style="list-style-type: none"><li><input type="radio"/> (8) &gt;60 to 70%</li><li><input type="radio"/> (9) &gt;70 to 80%</li><li><input type="radio"/> (10) &gt;80 to 90%</li><li><input type="radio"/> (11) &gt;90 to &lt;100%</li><li><input type="radio"/> (12) 100%</li></ul>
(I) Hedge funds	<ul style="list-style-type: none"><li><input type="radio"/> (1) 0%</li><li><input checked="" type="radio"/> (2) &gt;0 to 10%</li><li><input type="radio"/> (3) &gt;10 to 20%</li><li><input type="radio"/> (4) &gt;20 to 30%</li><li><input type="radio"/> (5) &gt;30 to 40%</li><li><input type="radio"/> (6) &gt;40 to 50%</li><li><input type="radio"/> (7) &gt;50 to 60%</li><li><input type="radio"/> (8) &gt;60 to 70%</li><li><input type="radio"/> (9) &gt;70 to 80%</li><li><input type="radio"/> (10) &gt;80 to 90%</li><li><input type="radio"/> (11) &gt;90 to &lt;100%</li><li><input type="radio"/> (12) 100%</li></ul>



Indicator ID	Dependent on:	00 5	Sub-section	PRI Principle	Type of Indicator
00 9 HF	Gateway to:	00 9	Stewardship: (Proxy) voting	GENERAL	CORE

Does your organisation have direct investments in listed equity across your hedge fund strategies?

PUBLIC

- (A) Yes
- (B) No

Indicator ID <b>OO 9</b>	Dependent on:	<b>OO 5.1, OO 5.3 LE, OO 9 HF</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

**PUBLIC**

	<b>(1) Listed equity - active</b>	<b>(2) Listed equity - passive</b>
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>OO 9.1</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 10.1, PGS 31</b>			

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

**PUBLIC**

*The percentage figure should combine internally and externally managed assets.*

	Percentage of your listed equity holdings over which you have the discretion to vote
(A) Listed equity – active	<ul style="list-style-type: none"> <li><input type="radio"/> (1) 0%</li> <li><input type="radio"/> (2) &gt;0 to 10%</li> <li><input type="radio"/> (3) &gt;10 to 20%</li> <li><input type="radio"/> (4) &gt;20 to 30%</li> <li><input type="radio"/> (5) &gt;30 to 40%</li> <li><input type="radio"/> (6) &gt;40 to 50%</li> <li><input type="radio"/> (7) &gt;50 to 60%</li> <li><input type="radio"/> (8) &gt;60 to 70%</li> <li><input type="radio"/> (9) &gt;70 to 80%</li> <li><input checked="" type="radio"/> (10) &gt;80 to 90%</li> <li><input type="radio"/> (11) &gt;90 to &lt;100%</li> <li><input type="radio"/> (12) 100%</li> </ul>
(B) Listed equity - passive	<ul style="list-style-type: none"> <li><input type="radio"/> (1) 0%</li> <li><input type="radio"/> (2) &gt;0 to 10%</li> <li><input type="radio"/> (3) &gt;10 to 20%</li> <li><input type="radio"/> (4) &gt;20 to 30%</li> <li><input type="radio"/> (5) &gt;30 to 40%</li> <li><input type="radio"/> (6) &gt;40 to 50%</li> <li><input type="radio"/> (7) &gt;50 to 60%</li> <li><input type="radio"/> (8) &gt;60 to 70%</li> <li><input type="radio"/> (9) &gt;70 to 80%</li> <li><input checked="" type="radio"/> (10) &gt;80 to 90%</li> <li><input type="radio"/> (11) &gt;90 to &lt;100%</li> <li><input type="radio"/> (12) 100%</li> </ul>

Indicator ID <b>OO 11</b>	Dependent on:	<b>OO 5, OO 5.3 LE, OO 5.3 FI, OO 5.3 HF</b>	Sub-section <b>Internally managed assets</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

**PUBLIC**

	<b>(1) Yes, we incorporate ESG factors into our investment decisions</b>	<b>(2) No, we do not incorporate ESG factors into our investment decisions</b>
<b>(A) Listed equity - passive</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(B) Listed equity - active - quantitative</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(C) Listed equity - active - fundamental</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(E) Fixed income - SSA</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(F) Fixed income - corporate</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(G) Fixed income - securitised</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(N) Hedge funds - Long/short credit</b>	<input checked="" type="radio"/>	<input type="radio"/>



Indicator ID <b>OO 12</b>	Dependent on:	<b>OO 5, OO 5.1</b>	Sub-section <b>External manager selection</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

For each externally managed asset class, does your organisation incorporate ESG factors when selecting external investment managers?

**PUBLIC**

	(1) Yes, we incorporate ESG factors when selecting external investment managers	(2) No, we do not incorporate ESG factors when selecting external investment managers
<b>(A) Listed equity - active</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(E) Private equity</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(G) Infrastructure</b>	<input checked="" type="radio"/>	<input type="radio"/>

Indicator ID <b>OO 13</b>	Dependent on:	<b>OO 5, OO 5.1</b>	Sub-section <b>External manager appointment</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

For each externally managed asset class, does your organisation incorporate ESG factors when appointing external investment managers?

**PUBLIC**

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
<b>(A) Listed equity - active</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(E) Private equity</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(G) Infrastructure</b>	<input checked="" type="radio"/>	<input type="radio"/>

Indicator ID <b>OO 14</b>	Dependent on:	<b>OO 5, OO 5.1</b>	Sub-section <b>External manager monitoring</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

For each externally managed asset class, does your organisation incorporate ESG factors when monitoring external investment managers?

**PUBLIC**

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
<b>(A) Listed equity - active</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(E) Private equity</b>	<input checked="" type="radio"/>	<input type="radio"/>
<b>(G) Infrastructure</b>	<input checked="" type="radio"/>	<input type="radio"/>

Indicator ID <b>OO 17 LE</b>	Dependent on:	<b>OO 11</b>	Sub-section <b>Listed equity</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 17.1 LE, LE 12</b>			

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

**PUBLIC**

*The percentage figure can be rounded to the nearest 5%.*

	<b>Percentage out of total internally managed active listed equity</b>
(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	100%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	0%
Total	100.00%

Indicator ID <b>OO 17.1 LE</b>	Dependent on:	<b>OO 17 LE</b>	Sub-section <b>Listed equity</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>LE 9</b>			

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

**PUBLIC**

*The percentage figure can be rounded to the nearest 5%.*

	<b>Percentage coverage out of your total listed equity assets where a screening approach is applied</b>
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	100%
(C) A combination of screening approaches	0%
Total	100.00%

Indicator ID <b>OO 17 FI</b>	Dependent on:	<b>OO 5.3 FI, OO 11</b>	Sub-section <b>Fixed income</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 17.1 FI, OO 20, FI 16–18</b>			

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

**PUBLIC**

*The percentage figure can be rounded to the nearest 5%.*

	<b>(1) Fixed income - SSA</b>	<b>(2) Fixed income - corporate</b>	<b>(3) Fixed income - securitised</b>
(A) Screening alone	0%	0%	0%
(B) Thematic alone	0%	0%	0%
(C) Integration alone	0%	0%	0%
(D) Screening and integration	100%	100%	100%
(E) Thematic and integration	0%	0%	0%
(F) Screening and thematic	0%	0%	0%
(G) All three approaches combined	0%	0%	0%
(H) None	0%	0%	0%
Total	100.00%	100.00%	100.00%

Indicator ID <b>OO 17.1 FI</b>	Dependent on:	<b>OO 17 FI</b>	Sub-section <b>Fixed income</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

**PUBLIC**

Indicate the percentage coverage out of your total fixed income assets where a screening approach is applied. The percentage figure can be rounded to the nearest 5%.

	<b>(1) Fixed income - SSA</b>	<b>(2) Fixed income - corporate</b>	<b>(3) Fixed income - securitised</b>
(A) Positive/best-in-class screening only	0%	0%	0%
(B) Negative screening only	100%	100%	100%
(C) A combination of screening approaches	0%	0%	0%
Total	100.00%	100.00%	100.00%

Indicator ID <b>OO 18</b>	Dependent on:	<b>OO 11–14</b>	Sub-section <b>Labelling and marketing</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 18.1</b>			

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

**PUBLIC**

- (A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

5%

*The percentage figure can be rounded to the nearest 5% and should combine internally and externally managed assets.*

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)



Indicator ID <b>OO 18.1</b>	Dependent on:	<b>OO 18</b>	Sub-section <b>Labelling and marketing</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>OO 18.2</b>			

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

**PUBLIC**

- (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

5%

*The percentage figure can be rounded to the nearest 5% and should combine internally and externally managed assets.*

- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator ID	Dependent on:	OO 18.1	Sub-section <b>Labelling and marketing</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
<b>OO 18.2</b>	Gateway to:	N/A			

Which ESG/RI certifications or labels do you hold?

**PUBLIC**

*Select all that apply.*

- (A) Commodity type label (e.g. BCI)
- (B) GRESB
- (C) Austrian Ecolabel (UZ49)
- (D) B Corporation
- (E) BREEAM
- (F) CBI Climate Bonds Standard
- (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- (I) EU Ecolabel
- (J) EU Green Bond Standard
- (K) Febelfin label (Belgium)
- (L) Finansol
- (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- (N) Greenfin label (France)
- (O) Grüner Pfandbrief
- (P) ICMA Green Bond Principles
- (Q) ICMA Social Bonds Principles
- (R) ICMA Sustainability Bonds Principles
- (S) ICMA Sustainability-linked Bonds Principles
- (T) Kein Verstoß gegen Atomwaffensperrvertrag
- (U) Le label ISR (French government SRI label)
- (V) Luxflag Climate Finance
- (W) Luxflag Environment
- (X) Luxflag ESG
- (Y) Luxflag Green Bond
- (Z) Luxflag Microfinance
- (AA) Luxflag Sustainable Insurance Products
- (AB) National stewardship code

Specify:

- (AC) Nordic Swan Ecolabel
- (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)

Specify:

- (AE) People's Bank of China green bond guidelines
- (AF) RIAA (Australia)
- (AG) Towards Sustainability label (Belgium)
- (AH) Other

Specify:

Indicator ID <b>OO 19</b>	Dependent on:	<b>OO 5.3 FI, OO 11</b>	Sub-section <b>Passive investments</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>LE 8, FI 10</b>			

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

**PUBLIC**

*The percentage figure can be rounded to the nearest 5%.*

	Percentage of AUM that utilise an ESG index or benchmark
(A) Listed equity - passive	40%

Indicator ID <b>OO 21</b>	Dependent on:	<b>Multiple indicators</b>	Sub-section <b>Summary of reporting requirements</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

**PUBLIC**

See 'Explanatory notes - Additional reporting requirements' for details on when a module is mandatory or voluntary to report on.

<b>Applicable modules</b>	<b>(1) Mandatory to report</b> <i>(pre-filled based on previous responses)</i>	<b>(2) Voluntary to report</b> <b>(2.1) Yes, I want to opt-in to reporting on the module</b>	<b>(2) Voluntary to report</b> <b>(2.2) No, I want to opt-out of reporting on the module</b>
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(A) Listed equity – passive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(B) Listed equity – active – quantitative	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(E) Fixed income – SSA	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(F) Fixed income – corporate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(G) Fixed income – securitised	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(N) Hedge funds – Long/short credit	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(T) External manager selection, appointment and monitoring (SAM) – listed equity - active	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(X) External manager selection, appointment and monitoring (SAM) – private equity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(Z) External manager selection, appointment and monitoring (SAM) – infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



Indicator ID <b>OO 32</b>	Dependent on:	<b>OO 3, OO 31</b>	Sub-section <b>Report disclosure</b>	PRI Principle <b>GENERAL</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

**PUBLIC**

See 'Additional reporting guidance' for the list of indicators affected by this setting.

- (A) Publish as absolute numbers
- (B) Publish as ranges

<b>Indicator ID</b> <b>PGS 1</b> <b>MINIMUM REQUIREMENT</b>	<b>Dependent on:</b>	<b>OO 8, OO 9</b>	<b>Sub-section</b> <b>Responsible investment policy elements</b>	<b>PRI Principle</b> <b>1, 2</b>	<b>Type of Indicator</b> <b>CORE</b>
	<b>Gateway to:</b>	<b>Multiple indicators</b>			

Which elements are covered in your formal responsible investment policy(ies)?

**PUBLIC**

*These elements may be set out in one or multiple standalone policy or guideline documents, or they may be part of a broader investment policy.*

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here

Specify:

- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements



Indicator ID <b>PGS 2</b>	Dependent on:	<b>PGS 1</b>	Sub-section <b>Responsible investment policy elements</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 3, PGS 9, PGS 11.1</b>			

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

**PUBLIC**

*These guidelines may be set out in one or multiple standalone policy or guideline documents, or they may be part of a broader investment policy.*

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues

Specify:

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator ID <b>PGS 3</b>	Dependent on:	<b>PGS 1, PGS 2</b>	Sub-section <b>Responsible investment policy elements</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Which elements of your formal responsible investment policy(ies) are publicly available?

**PUBLIC**

*For every selection, provide a link to your publicly available responsible investment policy or guidelines.*

- (A) Overall approach to responsible investment

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/2AAFC203-F178-4470-9BF8-044D6355B379/>

- (B) Guidelines on environmental factors

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/E88EF5BE-8F96-4888-9DC9-796222E1B150/>

- (C) Guidelines on social factors

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/D13B1C22-DDD3-412F-8C29-0A7DE23CB4ED/>

(D) Guidelines on governance factors

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/B090B227-4413-4A94-B680-AC219A1C7653/>

(E) Guidelines on sustainability outcomes

Add link:

Link: <https://www.nykreditinvest.dk/nyheder-og-rapporter/arsrapporter/>

File: <https://reporting.unpri.org/file/728305FC-CF68-4C76-A011-CC51CA39F8A3/>

(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/FB4A1F93-24DE-420B-B1C8-612388103CB5/>

- (G) Specific guidelines on human rights (may be part of guidelines on social factors)

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/1EFA868B-975D-4E5B-B372-DD571B558D64/>

- (I) Guidelines tailored to the specific asset class(es) we hold

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/0B634B40-FD23-4CC5-9DF1-38A2230E07E8/>

- (J) Guidelines on exclusions

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/C7F9A2C1-24E6-44C6-A7F9-71046378A573/>

- (K) Guidelines on managing conflicts of interest related to responsible investment

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/51B9C1F5-73A7-4D70-BD12-CD865E989FC5/>

- (L) Stewardship: Guidelines on engagement with investees

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredits-politik-for-baredygtige-investeringer-december-2022.pdf>

File: <https://reporting.unpri.org/file/0DA7AB0F-35E6-49AB-B73E-33EAB2642E3C/>

- (O) Stewardship: Guidelines on (proxy) voting

Add link:

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/EB25FF0D-D057-4832-B47D-D21DDB95AC09/>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Explain why:

Indicator ID <b>PGS 4</b>	Dependent on:	<b>PGS 1</b>	Sub-section <b>Responsible investment policy elements</b>	PRI Principle <b>1 – 6</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

**PUBLIC**

- (A) Yes

Elaborate:

The philosophy behind our sustainable investment policy is that environmental, social and governance (ESG) issues and how you deal with them have a major impact on corporate values and on long-term returns. The policy is based on an objective of generating value and making a difference through integration of sustainability in the investment process and by driving positive change. This is, in Nykredit's view, the best way to generate good risk-adjusted returns for our customers and, in a joint effort with our customers, to realise the ambition of a more sustainable development. Although some consider ESG data to be non-financial, we disagree. ESG issues may have as much, if not more, financial relevance as other types of fundamental information about an investment. Therefore, Nykredit integrates ESG in our investment processes, as we believe it has a bearing on the risks and return potential of an investment. This mindset builds on our own as well as external analyses of the correlation between sustainability risks and potential returns on the investment. These analyses and Nykredit's long experience with sustainable investment show us that there is a correlation between ESG performance and returns. Nykredit conducts ongoing analyses and reports on the issue in our annual reports. Nykredit's efforts towards contributing to climate transition and reaching our ambition of climate neutrality by 2050 are based on the recommendations of the Task Force on Climate-related Financial Disclosures. In this respect, too, the perspective is that, as the world moves towards climate neutrality, companies from many different sectors will be faced with climate-related risks and opportunities with major impacts on their long-term viability and value. The obvious example is companies involved in fossil fuels, which will be facing special risks, whereas other technologies within energy savings and renewables will have a greater potential. This potential and these risks are considered in the investment process. Nykredit will make principle-based decisions on exclusions of companies, for example, if these do not respect international norms or agreements. These decisions are based on our values and do not take the return potential of the company into consideration. In spite of this, it is our experience that Nykredit will be able to deliver competitive returns on our investments. This is due to the fact that these exclusions contribute to reducing sustainability risks over time, even though this was not the primary rationale for the exclusion. This could be the case of a coal mining company excluded due to not having any transition plan, and then later this company experiences a decline in demand as a result of the green transition. Another case could be the divestment of a sanctioned company, which experiences limitations to its business due to the sanctions.

Nykredit's sustainable investment policy and conflicts of interest policy is available on Nykredit's website.

(B) No

Explain why:

Indicator ID <b>PGS 5</b>	Dependent on:	<b>PGS 1</b>	Sub-section <b>Responsible investment policy elements</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

**PUBLIC**

*Policy(ies) or guidelines on stewardship outline signatories' stewardship approach, i.e. how they use their influence. This may be in a standalone policy or guideline or incorporated into a broader responsible investment policy or similar.*

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other

Specify:

- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship



Indicator ID <b>PGS 6</b>	Dependent on:	<b>PGS 1</b>	Sub-section <b>Responsible investment policy elements</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

**PUBLIC**

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator ID <b>PGS 7</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Responsible investment policy elements</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

**PUBLIC**

*The policy may be a standalone policy, part of a policy on stewardship, or incorporated into a wider responsible investment policy.*

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme

Add link(s):

- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

<b>Indicator ID</b> <b>PGS 8</b> <b>MINIMUM REQUIREMENT</b>	<b>Dependent on:</b>	<b>PGS 1</b>	<b>Sub-section</b> <b>Responsible investment policy coverage</b>	<b>PRI Principle</b> <b>1</b>	<b>Type of Indicator</b> <b>CORE</b>
	<b>Gateway to:</b>	<b>N/A</b>			

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

**PUBLIC**

	<b>Combined AUM coverage of all policy elements</b>
<b>(A) Overall approach to responsible investment</b> <b>(B) Guidelines on environmental factors</b> <b>(C) Guidelines on social factors</b> <b>(D) Guidelines on governance factors</b>	<input type="checkbox"/> (1) 50% or less <input type="checkbox"/> (2) >50% to 60% <input type="checkbox"/> (3) >60% to 70% <input type="checkbox"/> (4) >70% to 80% <input type="checkbox"/> (5) >80% to 90% <input type="checkbox"/> (6) >90% to <100% <input checked="" type="checkbox"/> (7) 100%

Indicator ID <b>PGS 9</b>	Dependent on:	<b>PGS 2</b>	Sub-section <b>Responsible investment policy coverage</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

**PUBLIC**

	<b>AUM coverage</b>
(A) Specific guidelines on climate change	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Specific guidelines on human rights	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM

Indicator ID <b>PGS 10</b>	Dependent on:	<b>OO 8, OO 9, PGS 1</b>	Sub-section <b>Responsible investment policy coverage</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

**PUBLIC**

*Policy(ies) or guidelines on stewardship outline signatories' stewardship approach, i.e. how they use their influence. It may be a standalone policy or guideline or incorporated into a broader responsible investment policy or similar.*

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(B) Fixed income

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%

- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(C) Private equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(E) Infrastructure

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(F) Hedge funds

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator ID <b>PGS 10.1</b>	Dependent on:	<b>OO 9.1, PGS 1</b>	Sub-section <b>Responsible investment policy coverage</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

**PUBLIC**

(A) Actively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(B) Passively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%



- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

<b>Indicator ID</b> <b>PGS 11</b> <b>MINIMUM REQUIREMENT</b>	<b>Dependent on:</b>	<b>N/A</b>	<b>Sub-section</b> <b>Roles and responsibilities</b>	<b>PRI Principle</b> <b>1</b>	<b>Type of Indicator</b> <b>CORE</b>
	<b>Gateway to:</b>	<b>Multiple indicators</b>			

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

**PUBLIC**

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

Nykredit's Sustainable Investment Policy is reviewed annually and is subject to approval by the Board of Directors of Nykredit A/S. The policy contributes to implementing the Nykredit Group's Corporate Responsibility Policy. The Board of Directors is briefed at least annually on Nykredit's corporate responsibility activities, often at the tie of publication of the statutory corporate responsibility report. The Group Executive Board makes up Nykredit's Corporate Responsibility Committee.

- (C) Investment committee, or equivalent

Specify:

Nykredit's Sustainable Investment Policy is reviewed annually and is subject to approval by the Board of Directors of Nykredit A/S. The policy contributes to implementing the Nykredit Group's Corporate Responsibility Policy. The Board of Directors is briefed at least annually on Nykredit's corporate responsibility activities. Nykredit's Forum on Sustainable Investments makes decisions relevant to the implementation of the sustainable investment policy.

- (D) Head of department, or equivalent

Specify department:

Nykredit's Forum on Sustainable Investments has representatives from Asset Management, Group Finance, Sparinvest, Nykredit Portfolio Administration and People and Identity. The Nykredit ESG team and the Nykredit Asset Management Forum on Sustainable Investments will assist the Forum on Sustainable Investments. The policy is implemented by the relevant business units.

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator ID <b>PGS 11.1</b>	Dependent on:	<b>PGS 1, PGS 2, PGS 11</b>	Sub-section <b>Roles and responsibilities</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

**PUBLIC**

*These elements may be set out in one or multiple standalone policy or guideline documents, or they may be part of a broader investment policy.*

	<b>(1) Board members, trustees, or equivalent</b>	<b>(2) Senior executive-level staff, investment committee, head of department, or equivalent</b>
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Guidelines on managing conflicts of interest related to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>PGS 11.2</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Roles and responsibilities</b>	PRI Principle <b>1 – 6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

**PUBLIC**

- (A) Yes

Describe how you do this:

The efforts are always signed by senior management either through the Forum on Sustainable Investments or by extension through the policies regarding public affairs.

- (B) No

Explain why:

- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

<b>Indicator ID</b> <b>PGS 12</b> <b>MINIMUM REQUIREMENT</b>	<b>Dependent on:</b>	<b>N/A</b>	<b>Sub-section</b> <b>Roles and responsibilities</b>	<b>PRI Principle</b> <b>1</b>	<b>Type of Indicator</b> <b>CORE</b>
	<b>Gateway to:</b>	<b>N/A</b>			

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

**PUBLIC**

- (A) Internal role(s)

Specify:

Decisions relevant to the implementation of the Sustainable Investment Policy are made by internal forums including Nykredit's Forum on Sustainable Investments, Nykredit Asset Management Forum on Sustainable Investments, and the Stewardship Forum. The day-to-day implementation is carried out by the ESG team, the individual investment teams, and other relevant internal teams such as our internal investment controlling team.

- (B) External investment managers, service providers, or other external partners or suppliers

Specify:

Where external investment managers are used, we require them to implement our Sustainable Investment Policy. We use service providers to both inform and help implement our approach, with services including proxy voting, provision of ESG data, and engagement.

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator ID <b>PGS 13</b>	Dependent on:	<b>PGS 11</b>	Sub-section <b>Roles and responsibilities</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

**PUBLIC**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Describe: (Voluntary)

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

The board of Nykredit, Sparinvest and the investment funds approve the policy on sustainable investments and the implementation of this. The evaluation of the board is a broader-looking process involving evaluation of the competencies and decisions made across the different areas of responsibility. The responsible investments is part of evaluation, however this is not specifically mentioned.

Indicator ID <b>PGS 14</b>	Dependent on:	<b>PGS 11</b>	Sub-section <b>Roles and responsibilities</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

**PUBLIC**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

- (1) KPIs are linked to compensation
- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

The implementation of the policies related to responsible investments including the on sustainable investments and the targets described in these are linked to the variable compensation of the senior executive-level staff.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Explain why: (Voluntary)



Indicator ID <b>PGS 15</b>	Dependent on:	<b>PGS 11</b>	Sub-section <b>Roles and responsibilities</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

**PUBLIC**

	<b>(1) Board members, trustees or equivalent</b>	<b>(2) Senior executive-level staff, investment committee, head of department or equivalent</b>
(A) Specific competence in climate change mitigation and adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>PGS 16</b>	Dependent on:	N/A	Sub-section <b>External reporting and disclosures</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

**PUBLIC**

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator ID <b>PGS 17</b>	Dependent on:	N/A	Sub-section <b>External reporting and disclosures</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

**PUBLIC**

<input checked="" type="checkbox"/> (A) Yes, including all governance-related recommended disclosures <input type="checkbox"/> (B) Yes, including all strategy-related recommended disclosures <input type="checkbox"/> (C) Yes, including all risk management-related recommended disclosures <input checked="" type="checkbox"/> (D) Yes, including all applicable metrics and targets-related recommended disclosures <input type="radio"/> (E) None of the above <b>Explain why: (Voluntary)</b>	<b>Add link(s):</b> Link: <a href="https://reports.sparinvest.dk/SFDRWebsiteDisclosure_DK0060361046_da.pdf">https://reports.sparinvest.dk/SFDRWebsiteDisclosure_DK0060361046_da.pdf</a> File: <a href="https://reporting.unpri.org/file/54ce6b97-dd29-4fcc-85e6-cf8fa679893a/">https://reporting.unpri.org/file/54ce6b97-dd29-4fcc-85e6-cf8fa679893a/</a>
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Indicator ID <b>PGS 18</b>	Dependent on:	N/A	Sub-section <b>External reporting and disclosures</b>	PRI Principle <b>6</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	N/A			

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

**PUBLIC**

*Provide one or more links to examples of your public reporting to such standards, frameworks, or regulations. This indicator's answer options do not intend to be an exhaustive list of the main international responsible investment standards, frameworks or regulations.*

- (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

Link: [https://reports.sparinvest.dk/SFDRWebsiteDisclosure\\_DK0060361046\\_da.pdf](https://reports.sparinvest.dk/SFDRWebsiteDisclosure_DK0060361046_da.pdf)

File: <https://reporting.unpri.org/file/338E5349-744A-4DFC-9F6D-2CCDCC83EFBA/>

- (B) Disclosures against the European Union's Taxonomy

Link to example of public disclosures

Link: [https://www.nykreditinvest.dk/globalassets/pdf-falles-dit-liv--din-virksomhed/nykredit-invest/pai-nykredit\\_dansk.pdf](https://www.nykreditinvest.dk/globalassets/pdf-falles-dit-liv--din-virksomhed/nykredit-invest/pai-nykredit_dansk.pdf)

File: <https://reporting.unpri.org/file/CB92119C-93E8-41EA-B7D2-1263CD18944F/>

- (C) Disclosures against the CFA's ESG Disclosures Standard

Link to example of public disclosures

(D) Disclosures against other international standards, frameworks or regulations

Specify:

Link to example of public disclosures

(E) Disclosures against other international standards, frameworks or regulations

Specify:

Link to example of public disclosures

(F) Disclosures against other international standards, frameworks or regulations

Specify:

Link to example of public disclosures

(G) Disclosures against other international standards, frameworks or regulations

Specify:

Link to example of public disclosures

Indicator ID <b>PGS 19</b>	Dependent on:	N/A	Sub-section <b>External reporting and disclosures</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

**PUBLIC**

*This includes any engagements conducted by third parties that do not focus exclusively or entirely on responsible investment.*

- (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

Link: <https://www.nykredit.com/en-gb/samfundsansvar/reporting/#reporting>

File: <https://reporting.unpri.org/file/00b28480-0015-4d32-932e-5a7ed33f5451/>

- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Explain why:

- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

Indicator ID <b>PGS 20</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Capital allocation</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Which elements do your organisation-level exclusions cover?

**PUBLIC**

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements

Specify:

- (F) Not applicable; our organisation does not have any organisation-level exclusions



Indicator ID <b>PGS 21</b>	Dependent on:	N/A	Sub-section <b>Capital allocation</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

How does your responsible investment approach influence your strategic asset allocation process?

**PUBLIC**

- (A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

- (B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

- (C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

- (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

Indicator ID <b>PGS 22</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

**PUBLIC**

*Your stewardship activities may be conducted directly by your organisation or by external investment managers or service providers on your behalf.*

	(1) Listed equity	(2) Fixed income	(3) Private equity	(5) Infrastructure	(6) Hedge funds
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Indicator ID <b>PGS 23</b>	Dependent on:	<b>OO 5, OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

**PUBLIC**

*If applicable, describe how this differs between asset classes.*

As investors, it is natural to have dialogue with holdings. For example, in our active, fundamental strategies, the investment teams communicate with companies as part of the investment process to bolster their understanding and highlight certain issues. We aim to continue the dialogue with our holdings after the initial investment. The ideal is to have a frank but constructive, two-way dialogue with our holdings, and we do not hesitate to give our views on key issues, whether short- or long-term, ESG or otherwise. However, we classify as "engagements" only those dialogues in which we have a specific goal. We take a practical and materiality-based approach: We focus on cases where we see potential for meaningful impact on corporate value and sustainability.

In our voting activity, we aim to vote all possible meetings across our funds. We use a custom policy at our service provider, based on our voting principles, to ensure that all recommendations are consistent with our policy; however, we also internally review all meetings for actively managed equities, and meetings of particular significance – due to size or controversy – across passive equities.

In our engagement activity, we prioritise our work by reference to various considerations. Our key engagements categories are Climate, Norms Related, Thematic, and Other company specific-ESG issues. Prioritisation has reference to materiality, potential for change, and position size, among other factors. Within certain areas, more specific frameworks exist: for example in climate related engagement, we consider the footprint of the fund, and follow NZAM and NZIF methodology.

Indicator ID <b>PGS 24</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

**PUBLIC**

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other

Specify:

- (D) We do not join collaborative stewardship efforts

Indicator ID <b>PGS 24.1</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

**PUBLIC**

We join institutional investors via forums such as Climate Action 100+ and PRI to co-ordinate engagement on specific ESG themes. Often, we will assume the role of lead investor where we run the engagement with one company on behalf of various investors, while other investors lead the engagement with other companies on Nykredit's behalf.

We also join engagements led by professional service providers. In these cases, we often join the engagement meetings, and we maintain a strong feedback loop with our service providers, for example, advising them of our own engagement experience with the company in question.

Indicator ID <b>PGS 25</b>	Dependent on:	<b>OO 5, OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

**PUBLIC**

*Ranking options: 1 = most important, 5 = least important*

- (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff

Select from the list:

1

- (B) External investment managers, third-party operators and/or external property managers, if applicable

Select from the list:

4

- (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

Select from the list:

2

- (D) Informal or unstructured collaborations with investors or other entities

Select from the list:

5

(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

Select from the list:

3

(F) We do not use any of these channels



Indicator ID <b>PGS 26</b>	Dependent on:	<b>OO 8, OO 9, PGS 1</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?

**PUBLIC**

*This indicator only applies to signatories that partially or fully outsource their stewardship activities to external service providers.*

(A) Example(s) of measures taken when selecting external service providers:

Rigorous RFPs on selection of external service providers will have questions on both coverage, due diligence measures and examples of specific companies, which we wish them to share their insights on.

(B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:

The proxy-voting provider is required to implement our policy through a custom-policy. The custom-policy must be updated at least once a year. In this yearly update, the KPIs and thresholds to be used for implementing the policy are specified.

(C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:

Nykredit continuously monitors our different engagements, using internal tools to share data and knowledge across teams. Progress in engagement in relation to a company is discussed in the relevant investment teams and at internal forum. In respect of breaches of international norms, the Sustainable Investment Forum decides whether objectives have been achieved and decides on potential exclusion of companies where engagement progress is unsatisfactory and achievement of the objectives is not deemed to be realistic. Participation in engagement calls by external service providers is one method used to monitor their activity, in addition to monitoring their written reporting on the engagement.

Indicator ID <b>PGS 27</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

**PUBLIC**

*Your stewardship activities and/or investment decision-making may be conducted directly by your organisation and/or by external investment managers or service providers on your behalf.*

The insights from stewardship play an important role in evaluating the company and assessing the future potential.

Our active investment teams are inherently involved in stewardship activities, given our approach of integrating ESG work into the investment teams. Our active investment teams play a key role in voting: the investment team will analyse agendas against our voting principles and in the context of dialogue or engagement with the holdings assess how best to vote.

Investment teams are also involved in running engagements. In our active, fundamental strategies, internal engagements are typically run by members of our investment teams, since our portfolio managers possess solid knowledge of the specific company that may further strengthen the dialogue. It also sends a clear message to the investee company that sustainability is an issue that runs to the heart of our investment decisions. Our investment teams are supported by our ESG team, who also run engagements on behalf of our quantitative and passive strategies.

Our belief is that this close integration means that stewardship activities are inherently closely linked to our investment decision making.

Indicator ID <b>PGS 28</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Overall stewardship strategy</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

If relevant, provide any further details on your organisation's overall stewardship strategy.

**PUBLIC**

Nykredit invests sustainably, with a long-term mindset. We recognise that there is no such thing as 'perfect' and that sustainability is not as simple as good versus bad. Instead, we believe that in the potential for positive change - whether in terms of driving investment returns or achieving societal goals. We also recognise that investing sustainably does not end with the investment decision. In fact, that is just the beginning. Our investment philosophy is an ownership philosophy. We see equity investment, for example, as owning real stakes, in real economies. This means we have the opportunity, but also the responsibility, to be active owners, communicating with the companies in which we invest, and potentially influencing their behavior. The aim of this cooperation is to foster long-term, sustainable corporate value.

Our active investment teams are inherently involved in stewardship activities, given our approach of integrating ESG work into the investment teams. Our active investment teams play a key role in voting: the investment team will analyse agendas against our voting principles and in the context of dialogue or engagement with the holdings assess how best to vote.

Investment teams are also involved in running engagements. In our active, fundamental strategies, internal engagements are typically run by members of our investment teams, since our portfolio managers possess solid knowledge of the specific company that may further strengthen the dialogue. It also sends a clear message to the investee company that sustainability is an issue that runs to the heart of our investment decisions. Our investment teams are supported by our ESG team, who also run engagements on behalf of our quantitative and passive strategies.

Our belief is that this close integration means that stewardship activities are inherently closely linked to our investment decision making.

Indicator ID <b>PGS 29</b>	Dependent on:	<b>OO 9, PGS 1</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

**PUBLIC**

*This indicator refers to voting recommendations rather than voting execution. Voting may be executed by the signatory organisation or by an external service provider.*

- (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

- (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

- (1) in all cases
- (2) in a majority of cases
- (3) in a minority of cases

- (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator ID <b>PGS 30</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How is voting addressed in your securities lending programme?

**PUBLIC**

- (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting

Provide details on these criteria:

- (C) Other

Specify:

- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator ID <b>PGS 31</b>	Dependent on:	<b>OO 9.1</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

**PUBLIC**

*Select the answer option that reflects your approach for the majority of votes cast across all your listed equity and hedge funds AUM over which you have the discretion to vote.*

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator ID <b>PGS 32</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

**PUBLIC**

*If a signatory has publicly and/or privately communicated their voting intentions at least once during the reporting year, answer options A, B and/or C can be selected, respectively.*

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website

Add link(s) to public disclosure:

Link: <https://shareaction.org/news/investor-momentum-snowballs-for-credit-suisse-climate-resolution>

File: <https://reporting.unpri.org/file/6a8d51b3-9e67-406a-ad1d-d1b261bbe939/>

- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator ID <b>PGS 33</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 33.1</b>			

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

**PUBLIC**

- (A) Yes, for all (proxy) votes

Add link(s):

Link: <https://www.nykreditinvest.dk/baredygtighed/nykredit-voting-dashboard/>

File: <https://reporting.unpri.org/file/31cce5f5-ea31-4023-ab4a-8feef763a71d/>

Link: <https://www.sparinvest.lu/investing-responsibly/stewardship/>

File: <https://reporting.unpri.org/file/8bc5a773-41ff-4e31-adb0-07a48cd94627/>

- (B) Yes, for the majority of (proxy) votes

Add link(s):

- (C) Yes, for a minority of (proxy) votes

Add link(s):



Explain why you only publicly disclose a minority of (proxy) voting decisions:

- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Explain why:

Indicator ID	Dependent on:	PGS 33	Sub-section	PRI Principle	Type of Indicator
PGS 33.1	Gateway to:	N/A	Stewardship: (Proxy) voting	2	CORE

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

PUBLIC

- (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

Indicator ID <b>PGS 34</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

**PUBLIC**

	<b>(1) In cases where we abstained or voted against management recommendations</b>	<b>(2) In cases where we voted against an ESG-related shareholder resolution</b>
(A) Yes, we publicly disclosed the rationale	<input type="radio"/> (1) for all votes <input type="radio"/> (2) for a majority of votes <input checked="" type="radio"/> (3) for a minority of votes	<input type="radio"/> (1) for all votes <input type="radio"/> (2) for a majority of votes <input checked="" type="radio"/> (3) for a minority of votes
(B) Yes, we privately communicated the rationale to the company	<input type="radio"/> (1) for all votes <input type="radio"/> (2) for a majority of votes <input checked="" type="radio"/> (3) for a minority of votes	<input type="radio"/> (1) for all votes <input type="radio"/> (2) for a majority of votes <input checked="" type="radio"/> (3) for a minority of votes
(C) We did not publicly or privately communicate the rationale, or we did not track this information	<input type="radio"/>	<input type="radio"/>
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	<input type="radio"/>	<input type="radio"/>

(A) Yes, we publicly disclosed the rationale - Add link(s):

Link: <https://www.nykreditinvest.dk/globalassets/pdf-falles-dit-liv--din-virksomhed/nykredit-invest/foreningernes-rapport-om-samfundsansvar-2022.pdf>

File: <https://reporting.unpri.org/file/aa1573c6-2c51-4c43-bd5b-e9f6f96867ef/>

Indicator ID <b>PGS 35</b>	Dependent on:	<b>OO 9</b>	Sub-section <b>Stewardship: (Proxy) voting</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

**PUBLIC**

*Through an example, explain what measure(s) your organisation has in place to overcome any bureaucratic and logistical obstacles in the voting chain and confirmation process.*

In 2022, we reviewed our proxy voting service provider setup, and consolidated to one provider. The process underlined again the significance of continuous monitoring of the different contact points in the proxy voting value chain, i.e., custodians, sub-custodians, ballot providers, and administrative setup, such as the presence and validity of PoA documents.

We strengthened our proxy voting process and now have one FTE who, during peak voting season, is dedicated to oversee the proxy voting , as well as take part in reviewing AGM agenda items in collaboration with our portfolio managers. On an ad-hoc basis, this employee reviews vote confirm reports to make sure the votes cast have the status of “confirmed”, rather than just “received”. Random checks are used to monitor whether the number of votable shares in the proxy voting system corresponds to our figures. Further, our service provider’s system includes a function to verify whether ballots are coming in and being registered for the AGMs. In case missing or rejected ballots are discovered, the employee will reach out to either our proxy voting provider or our custodian banks to investigate the issue – or, reach out internally to our fund support team if the problem lies at, for example, the PoA level.

From time to time, the issue lies at the ballot provider, which will then be contacted by the custodian, who has been notified by us. An example of this occurred in early spring 2023, where ballots were not coming in for a few companies; this was due to a change in a custodian’s ballot provider, whereby some positions were not properly migrated. We liaised with the custodian (who in turn liaised with the ballot provider) to ensure rectification of the issue. We aim to be proactive about common difficulties such as Powers of Attorney, early and disparate cut off dates, etc., in order to make sure that the flow of proxy voting functions as well as possible.

Indicator ID <b>PGS 36</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Escalation</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

**PUBLIC**

	(1) Listed equity	(2) Direct listed equity holdings in hedge fund portfolios
(A) Joining or broadening an existing collaborative engagement or creating a new one	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal	<input type="checkbox"/>	<input type="checkbox"/>
(C) Publicly engaging the entity, e.g. signing an open letter	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(D) Voting against the re-election of one or more board directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(F) Divesting	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(G) Litigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(H) Other	<input type="checkbox"/>	<input type="checkbox"/>
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	<input type="radio"/>	<input checked="" type="radio"/>

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings - (2) Direct listed equity holdings in hedge funds portfolios - Explain why: (Voluntary)

Indicator ID <b>PGS 37</b>	Dependent on:	<b>OO 5.1, OO 5.3 FI, OO 8</b>	Sub-section <b>Stewardship: Escalation</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

**PUBLIC**

- (A) Joining or broadening an existing collaborative engagement or creating a new one
- (B) Publicly engaging the entity, e.g. signing an open letter
- (C) Not investing
- (D) Reducing exposure to the investee entity
- (E) Divesting
- (F) Litigation
- (G) Other

Specify:

- (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

Explain why: (Voluntary)

Indicator ID <b>PGS 38</b>	Dependent on:	<b>OO 8, OO 5.3 FI</b>	Sub-section <b>Stewardship: Escalation</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Describe your approach to escalation for your internally managed SSA and/or private debt fixed income assets.

**PUBLIC**

(A) SSA - Approach to escalation

Reducing exposure, divesting.

Indicator ID <b>PGS 39</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Engagement with policy makers</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 39.1, PGS 39.2</b>			

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

**PUBLIC**

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Explain why: (Voluntary)



Indicator ID	Dependent on:	PGS 39	Sub-section	PRI Principle	Type of Indicator
PGS 39.1	Gateway to:	N/A	Stewardship: Engagement with policy makers	2	CORE

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

PUBLIC

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups

Describe:

- (D) We engaged policy makers on our own initiative

Describe:

- (E) Other methods

Describe:

Indicator ID <b>PGS 39.2</b>	Dependent on:	<b>PGS 39</b>	Sub-section <b>Stewardship: Engagement with policy makers</b>	PRI Principle <b>2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

**PUBLIC**

- (A) We publicly disclosed all our policy positions

Add link(s):

Link: <https://www.nykreditinvest.dk/baredygtighed/sfdr/>

File: <https://reporting.unpri.org/file/69ad88d7-b7f0-475d-8328-9c69318dca63/>

- (B) We publicly disclosed details of our engagements with policy makers

Add link(s):

- (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

Explain why:

Indicator ID <b>PGS 40</b>	Dependent on:	<b>OO 8, OO 9</b>	Sub-section <b>Stewardship: Examples</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

**PUBLIC**

	<b>(1) Led by</b>	<b>(2) Primary focus of stewardship activity</b>	<b>(3) Asset class(es)</b>	<b>(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.</b>
<b>(A) Example 1:</b> <b>Title of stewardship activity:</b> ESG KPIs in Remuneration	<ul style="list-style-type: none"> <li>● (1) Internally led</li> <li>○ (2) External service provider led</li> <li>○ (3) Led by an external investment manager, real assets third-party operator and/or external property manager</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> (1) Environmental factors</li> <li><input type="checkbox"/> (2) Social factors</li> <li><input checked="" type="checkbox"/> (3) Governance factors</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> (1) Listed equity</li> <li><input type="checkbox"/> (2) Fixed income</li> <li><input type="checkbox"/> (3) Private equity</li> <li><input type="checkbox"/> (4) Real estate</li> <li><input type="checkbox"/> (5) Infrastructure</li> <li><input type="checkbox"/> (6) Hedge funds</li> <li><input type="checkbox"/> (7) Forestry</li> <li><input type="checkbox"/> (8) Farmland</li> <li><input type="checkbox"/> (9) Other</li> </ul>	<p>Terex is a US maker of aerial work platforms and other industrial equipment. Over the years, we have had dialogue on various ESG issues. We have held specific discussions on remuneration with a board member and Chair of the compensation committee, encouraging the company in increase the use of ESG criteria in assessing remuneration. During 2022, discussions continued with Terex, as they sought input from stakeholders including ourselves in their first major ESG materiality assessment. Explicitly recognizing the feedback from shareholders in recent years, the company has included and subsequently expanded the use ESG objectives in the CEO compensation targets. We consider this engagement to be closed, but will maintain dialogue with the company.</p>
<b>(B) Example 2:</b> <b>Title of stewardship activity:</b> Financed Emissions	<ul style="list-style-type: none"> <li>● (1) Internally led</li> <li>○ (2) External service provider led</li> <li>○ (3) Led by an external investment manager, real assets third-party operator and/or external property manager</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> (1) Environmental factors</li> <li><input type="checkbox"/> (2) Social factors</li> <li><input type="checkbox"/> (3) Governance factors</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> (1) Listed equity</li> <li><input type="checkbox"/> (2) Fixed income</li> <li><input type="checkbox"/> (3) Private equity</li> <li><input type="checkbox"/> (4) Real estate</li> </ul>	<p>During 2022, we continued our work engaging with banks on climate targets. Our aims are to encourage 1.5°C aligned target setting for financed emissions. Recognizing not only the importance of long-term targets, but for urgent short-term action, we urge prompt setting of appropriate targets and pathways for the financing of higher-emitting sectors. We consider both the rigour and scope of targets. While it is increasingly common for banks to have targets related to</p>

			<input type="checkbox"/> (5) Infrastructure <input type="checkbox"/> (6) Hedge funds <input type="checkbox"/> (7) Forestry <input type="checkbox"/> (8) Farmland <input type="checkbox"/> (9) Other	<p>lending activity, we are encouraging clearer commitments related to capital market financing. Our focus with the banks is on encouraging real world emissions reductions, both through helping their clients transition, and reducing financing of activities incapable of transition. While some banks are more advanced than others, our engagement is broad-based, recognizing that this is a sector-wide issue. The engagement also links closely with our voting activity. The AGM season saw many banks with climate-related shareholder resolutions, and/or Say-on-Climate proposals introduced by the banks themselves, and in such situations, we generally voted in a manner supporting a robust approach to climate. Progress on this issue is generally incremental, with additional policy statements and funding commitments introduced by some of the banks during the year.</p> <p>Furthermore, Nykredit has for several years engaged with the steel manufacturer Arcelormittal on climate risks and other issues. Primary steel manufacturing is extremely carbon intense, but the material is crucial for infrastructure development, and specifically for transition related infrastructure. In 2022, progress includes the first (limited) shipments of green steel flat products in Spain.</p>
<p><b>(C) Example 3:</b>  <b>Title of stewardship activity:</b>  Corruption and money-laundering</p>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) Internally led</li> <li><input checked="" type="radio"/> (2) External service provider led</li> <li><input type="radio"/> (3) Led by an external investment manager, real assets third-party operator and/or external property manager</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> (1) Environmental factors</li> <li><input checked="" type="checkbox"/> (2) Social factors</li> <li><input checked="" type="checkbox"/> (3) Governance factors</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> (1) Listed equity</li> <li><input type="checkbox"/> (2) Fixed income</li> <li><input type="checkbox"/> (3) Private equity</li> <li><input type="checkbox"/> (4) Real estate</li> <li><input type="checkbox"/> (5) Infrastructure</li> <li><input type="checkbox"/> (6) Hedge funds</li> <li><input type="checkbox"/> (7) Forestry</li> </ul>	<p>The global investment bank Goldman Sachs has been involved in cases of corruption and money-laundering, among other things. The company has responded well to dialogue concerning these cases and has, over the years, implemented a long list of measures to prevent any future cases of this kind, just as it has paid a fine of USD 2.8 billion. The company was previously placed on Sustainalytics' watch list regarding compliance with the principles of the UN Global Compact. This means that Sustainalytics previously suspected that the company was at risk of acting in breach of international</p>

			<input type="checkbox"/> (8) Farmland <input type="checkbox"/> (9) Other	standards. Goldman Sachs has been removed from the watch list and is now deemed to be “compliant”, meaning that Sustainalytics no longer believes that the company is at risk of acting in breach of international standards or principles. Based on constructive dialogue with the company, its willingness to improve, and its implementation of specific initiatives, the funds’ investment advisers have decided to end its engagement with Goldman Sachs.
<b>(D) Example 4:</b> <b>Title of stewardship activity:</b> Employee rights	<input type="radio"/> (1) Internally led <input checked="" type="radio"/> (2) External service provider led <input type="radio"/> (3) Led by an external investment manager, real assets third-party operator and/or external property manager	<input type="checkbox"/> (1) Environmental factors <input checked="" type="checkbox"/> (2) Social factors <input checked="" type="checkbox"/> (3) Governance factors	<input checked="" type="checkbox"/> (1) Listed equity <input type="checkbox"/> (2) Fixed income <input type="checkbox"/> (3) Private equity <input type="checkbox"/> (4) Real estate <input type="checkbox"/> (5) Infrastructure funds <input type="checkbox"/> (6) Hedge funds <input type="checkbox"/> (7) Forestry <input type="checkbox"/> (8) Farmland <input type="checkbox"/> (9) Other	US retailer Walmart has for a number of years been involved in cases of breach of employee rights, including wage dumping and discrimination. Walmart has responded well to engagement relating to these cases and has, over the years, launched a series of initiatives for improvement and prevention of similar cases. Walmart has demonstrated positive responsiveness and willingness to improve its practices in the area of employee rights and now continuously reports on “human capital” – key benchmarks with detailed references to the UN SDGs, the Global Reporting Directive and Sustainability Accounting Standards Boards. This way, the company has provided insight into its methodologies used to measure its initiatives in the area of human capital, including diversity, pay, promotion and employee development programmes. Based on the company’s responsiveness to dialogue and its classification as “compliant” by Sustainalytics, the funds’ investment advisers have decided to end its engagement with Walmart.
<b>(E) Example 5:</b>	<input type="radio"/> (1) Internally led <input type="radio"/> (2) External service provider led	<input type="checkbox"/> (1) Environmental factors	<input type="checkbox"/> (1) Listed equity <input type="checkbox"/> (2) Fixed income	

<b>Title of stewardship activity:</b>	<input type="radio"/> (3) Led by an external investment manager, real assets third-party operator and/or external property manager	<input type="checkbox"/> (2) Social factors <input type="checkbox"/> (3) Governance factors	<input type="checkbox"/> (3) Private equity <input type="checkbox"/> (4) Real estate <input type="checkbox"/> (5) Infrastructure <input type="checkbox"/> (6) Hedge funds <input type="checkbox"/> (7) Forestry <input type="checkbox"/> (8) Farmland <input type="checkbox"/> (9) Other	
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Indicator ID <b>PGS 41</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Climate change</b>	PRI Principle <b>General</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 41.1</b>			

Has your organisation identified climate-related risks and opportunities affecting your investments?

**PUBLIC**

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Nykredit measures carbon footprint and ESG climate risk and opportunity analysis on all equity funds. The same goes for all corporate funds. Climate risk is also relevant for sovereign debt. The framework is different in nature than other asset classes but the basics regarding physical and transitional risks are the same. Data for covered bonds are very limited, but the asset class is covered by analyzing credit risk programs as well as looking at the aggregate analysis on Denmark, which covers almost all the allocated proceeds. Climate risk and opportunity play an integral role in both infrastructure as well as private equity investments. The instruments/tools used for analysis are databases provided by CDP Investor, MSCI ESG Research and Bloomberg, among others.

Climate-related information influences our decision-making process directly through the implementation of our exclusion list. Climate change is perhaps the single most significant ESG issue, whether in terms of its impact on global society and the environment or in terms of its economic and investment impact. This is reflected in our integration of ESG considerations into our investment processes, in our stewardship efforts, in our management and measurement of climate-related risks and in our overarching climate exclusions. Certain funds go further and exclude companies with exposure to industries such as thermal coal, oil and gas as well as utility companies. As an example, we have excluded Arch Coal Inc. as part of our fossil fuel policy.

Nykredit's Sustainable Investment Forum decides on the universal exclusions, which apply across all of Nykredit's investments. All decisions on exclusion must be executed as soon as possible after the decision has been made, always provided that it is carried out in an appropriate manner for investment purposes under the given market conditions. If the Sustainable Investment Forum decides to exclude a company, evaluation will be undertaken within two years of the decision in order to determine whether exclusion of the company is still warranted.

(B) Yes, beyond our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Explain why:



Indicator ID	Dependent on:	PGS 41	Sub-section	PRI Principle	Type of Indicator
PGS 41.1	Gateway to:	N/A	Climate change	General	CORE

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

PUBLIC

*Signatories should provide information on their transition plans, if available. A transition plan is an aspect of an organisation's overall strategy that lays out a set of targets and actions supporting its transition toward a low-carbon economy, including actions such as reducing its greenhouse gas emissions.*

- (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Nykredit wants to conduct our investments in alignment with the Paris Agreement and contribute to reaching the UN Sustainable Development Goals (SDGs). We commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. This means that our investments will contribute to limiting global warming to 1.5° C in alignment with the International Energy Agency Net Zero Scenario.

We address climate related risks and opportunities in numerous ways. Consideration of climate risks forms part of our product planning. All our products are restricted from investing in companies with more than 5% revenue exposure towards thermal coal, unconventional oil and gas and arctic drilling, and moving forward, we in principle exclude companies that expand oil and gas activities in breach of the IEA NZE2050 scenario. These exclusions help reduce climate risks in our investment portfolios. In addition to reducing the climate footprint, they will also reduce the financial risks of investing in companies that are directly impacted by the green transition.

Several products are restricted further from investing in companies with any exposure towards fossil fuels. We have numerous products that track a EU PAB and as such are reducing emissions annually and overweighting investments in climate solutions.

Several of our products have stated minimum guarantees for investments in climate solutions (taxonomy aligned investments). Similarly our products classified as Article 9 within SFDR can only make sustainable investments, which includes a sustainable contribution as well as a restriction against environmentally harmful activities.

Across our product range, our stewardship approach includes climate as a key pillar, both in voting activity, and engagement.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Explain why:

Indicator ID <b>PGS 42</b>	Dependent on:	N/A	Sub-section <b>Climate change</b>	PRI Principle <b>General</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	N/A			

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

**PUBLIC**

(A) Coal

Describe your strategy:

Certain funds exclude companies with exposure to industries such as thermal coal. We also aim to engage with remaining companies with significant exposure.

(B) Gas

Describe your strategy:

Certain funds exclude companies with exposure to industries such as gas. We also aim to engage with remaining companies with significant exposure.

(C) Oil

Describe your strategy:

Certain funds exclude companies with exposure to industries such as oil.

(D) Utilities

Describe your strategy:

We exclude utility companies with more than 5% of generation revenue stemming from thermal coal. Certain funds have more specific restrictions on power generation from various sources.

(E) Cement

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as materials (including cement) involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

(F) Steel

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as materials (including steel) involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

(G) Aviation

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as transportation involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

(H) Heavy duty road

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as transportation involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

(I) Light duty road

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a

recognition that certain sectors such as transportation involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

(J) Shipping

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as transportation involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

(K) Aluminium

Describe your strategy

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as materials (including aluminium) involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

- (L) Agriculture, forestry, fishery

Describe your strategy:

- (M) Chemicals

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as materials involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

- (N) Construction and buildings

Describe your strategy:

As noted in our Sustainable Investment Policy, we commit our investment activities to be climate neutral by 2050, thereby contributing to limiting global warming to 1.5°C. The primary contributor to this will be the individual companies' efforts to become climate neutral, but there may also be investments both in activities that reduce greenhouse gas (GHG) levels in the atmosphere, and in companies with exposure to GHG emitting activities. Inherent in this, is a recognition that certain sectors such as construction involve activities and products that are key to society, but have a high level of carbon intensity that makes transition vital. This implies that for certain such areas, investment can remain appropriate, but with stewardship designed to encourage transition. This is a key part of our rationale in being NZAMI signatories, and implementing the Net Zero Investment Framework, which commits us to engaging with companies responsible for significant proportion of emissions from our AUM, which are not assessed as being at net zero or aligned with net zero. Our assessment of alignment is inherently stricter for high climate impact sectors.

- (O) Textile and leather

Describe your strategy:

- (P) Water

Describe your strategy:

- (Q) Other

Specify:

Describe your strategy:

- (R) We do not have a strategy addressing high-emitting sectors

Provide a link(s) to your strategy(ies), if available

Link: <https://www.nykredit.com/globalassets/nykredit.com/pdf/nykredit-policy-on-sustainable-investments-december-2022.pdf>

File: <https://reporting.unpri.org/file/81e5a3b2-0014-4e4a-9839-dc81ecbf5bd/>





Indicator ID <b>PGS 43</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Climate change</b>	PRI Principle <b>General</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

**PUBLIC**

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios

Specify:

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator ID <b>PGS 44</b>	Dependent on:	N/A	Sub-section <b>Climate change</b>	PRI Principle <b>General</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

**PUBLIC**

- (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Climate transition processes are embedded in our Sustainable Investment Policy, and using the governance structures applicable to the policy. Climate risks are reported the same way as other sustainability risks.

(2) Describe how this process is integrated into your overall risk management

Climate related risk are identified as financial risks which need to be mitigated either through engagement or divestment.

- (B) Yes, we have a process to manage climate-related risks

(1) Describe your process

(2) Describe how this process is integrated into your overall risk management

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Explain why: (Voluntary)

Indicator ID <b>PGS 45</b>	Dependent on:	N/A	Sub-section <b>Climate change</b>	PRI Principle <b>General</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

**PUBLIC**

*Specify whether your organisation disclosed the methodology used to calculate any relevant climate risk metrics and variables affecting your investments. Disclosures made during the reporting year may be about metrics of the year before the reporting year.*

(A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(B) Exposure to transition risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(C) Internal carbon price

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(D) Total carbon emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

Link: [https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport\\_om\\_samfundsansvar\\_uk\\_28022023\\_.pdf](https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport_om_samfundsansvar_uk_28022023_.pdf)

File: <https://reporting.unpri.org/file/8FB208E4-504A-45B4-AC8B-737729E2133B/>

(E) Weighted average carbon intensity

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

Link: [https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport\\_om\\_samfundsansvar\\_uk\\_28022023\\_.pdf](https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport_om_samfundsansvar_uk_28022023_.pdf)

File: <https://reporting.unpri.org/file/AB42B483-FC7B-4212-91AD-2F35D52AA659/>

(F) Avoided emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(G) Implied Temperature Rise (ITR)

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(I) Proportion of assets or other business activities aligned with climate-related opportunities

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

Link: <https://www.nykreditinvest.dk/nyheder-og-rapporter/arsrapporter/>

File: <https://reporting.unpri.org/file/4D623B68-7099-492A-A0F3-9CC11110CF45/>

(J) Other metrics or variables

Specify:

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology
- (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Explain why: (Voluntary)



Indicator ID <b>PGS 46</b>	Dependent on:	N/A	Sub-section <b>Climate change</b>	PRI Principle <b>General</b>	Type of Indicator <b>CORE</b>
	Gateway to:	N/A			

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

**PUBLIC**

*Specify whether your organisation disclosed the methodology used to calculate its greenhouse gas emissions. Disclosures made during the reporting year may be about metrics of the year before the reporting year.*

(A) Scope 1 emissions

(1) Indicate whether this metric was disclosed, including the methodology

- (1) Metric disclosed
- (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

Link: [https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport\\_om\\_samfundsansvar\\_uk\\_28022023\\_.pdf](https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport_om_samfundsansvar_uk_28022023_.pdf)

File: <https://reporting.unpri.org/file/80b2a8f2-58f5-40f3-b498-3ade6c3fcbb2/>

(B) Scope 2 emissions

(1) Indicate whether this metric was disclosed, including the methodology

- (1) Metric disclosed
- (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

Link: [https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport\\_om\\_samfundsansvar\\_uk\\_28022023\\_.pdf](https://www.nykredit.com/siteassets/ir/files/corporate-responsibility/csr-reports/rapport_om_samfundsansvar_uk_28022023_.pdf)

File: <https://reporting.unpri.org/file/9f832a23-7ad3-46c0-812b-453dc1565fc4/>

(C) Scope 3 emissions (including financed emissions)

(1) Indicate whether this metric was disclosed, including the methodology

(1) Metric disclosed

(2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

(D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

Indicator ID <b>PGS 47</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Sustainability outcomes</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

**PUBLIC**

*All investment activities can be connected to positive and negative outcomes. An organisation's intended and unintended sustainability outcomes may include, for example, greenhouse gas emissions or actual and potential negative human rights outcomes for people.*

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Explain why:

Indicator ID <b>PGS 47.1</b>	Dependent on:	<b>PGS 47</b>	Sub-section <b>Sustainability outcomes</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

**PUBLIC**

*All investment activities can be connected to positive and negative outcomes. An organisation's intended and unintended sustainability outcomes may include, for example, greenhouse gas emissions or actual and potential negative human rights outcomes.*

- (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy
- (F) Other relevant taxonomies

Specify:

- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)

Specify:

- (K) Other regional framework(s)

Specify:

- (L) Other sectoral/issue-specific framework(s)

Specify:

- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator ID <b>PGS 47.2</b>	Dependent on:	<b>PGS 47</b>	Sub-section <b>Sustainability outcomes</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 48</b>			

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

**PUBLIC**

*Select a maximum of four responses.*

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method

Specify:

- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator ID <b>PGS 48</b>	Dependent on:	<b>PGS 47.2</b>	Sub-section <b>Sustainability outcomes</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>PGS 48.1, SO 1</b>			

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

**PUBLIC**

*All investment activities can be connected to positive and negative outcomes. An organisation's intended and unintended sustainability outcomes may include, for example, greenhouse gas emissions or actual and potential negative human rights outcomes.*

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Explain why not:

Indicator ID <b>PGS 48.1</b>	Dependent on:	<b>PGS 48</b>	Sub-section <b>Sustainability outcomes</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

**PUBLIC**

*Select a maximum of four responses.*

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

Specify:



Indicator ID <b>PGS 49</b>	Dependent on:	<b>PGS 47</b>	Sub-section <b>Human rights</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>PGS 49.1</b>			

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

**PUBLIC**

- (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We require that the companies we invest in comply with international norms and respect human rights. We regularly screen the investment universe for breaches of international norms. We attempt to use dialogue, often together with other investors, to encourage remedy of breaches. At the end of 2022, Nykredit had engagements via a service provider with 10 companies related to breach of human rights; we also began preparatory work on a direct engagement on a more proactive basis regarding human rights policy statements, an approach which we are considering applying to other holdings.

However, dialogue does not always progress to our satisfaction. In such cases, we consider why, whether it is appropriate to escalate, and if so, which steps would be appropriate. If a company violates international guidelines and conventions and is unwilling or unable, despite Nykredit's engagement, to remedy the violation, the Company will be excluded.

- (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

Explain how these activities were conducted:

- (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

Explain how these activities were conducted:

- (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

Specify:

Explain how these activities were conducted:

- (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator ID <b>PGS 49.1</b>	Dependent on:	<b>PGS 49</b>	Sub-section <b>Human rights</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

**PUBLIC**

*Specify for which sectors you included each relevant stakeholder group(s).*

(A) Workers

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(B) Communities

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples

- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(C) Customers and end-users

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(D) Other stakeholder groups

Specify:

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary

- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

Indicator ID <b>PGS 49.2</b>	Dependent on:	<b>PGS 47</b>	Sub-section <b>Human rights</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

**PUBLIC**

- (A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

We use the corporate disclosures as input before making investment decision as well as validating the information that our service providers deliver. The information is also used in the evaluation of the company as well as specific engagement activities.

- (B) Media reports

Provide further detail on how your organisation used these information sources:

We use media reports as input before making investment decision as well as validating the information that our service providers deliver. The information is also used in the evaluation of the company as well as specific engagement activities.

- (C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

We use information from NGOs and human rights institutions as input before making investment decision as well as validating the information that our service providers deliver. The information is also used in the evaluation of the company as well as specific engagement activities.

- (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

Provide further detail on how your organisation used these information sources:

The country reports are used in the investment decision making as well as validating the information that our service providers deliver. This goes specifically for our investments and exclusions in emerging market debt.

- (E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

We use information from our data provider to evaluate the companies in our portfolio as well as specific engagement activities.

- (F) Human rights violation alerts

Provide further detail on how your organisation used these information sources:

We use information from human rights violation alerts before making investment decision as well as validating the information that our service providers deliver. The information is also used in the evaluation of the company as well as specific engagement activities.

- (G) Sell-side research

Provide further detail on how your organisation used these information sources:

- (H) Investor networks or other investors

Provide further detail on how your organisation used these information sources:

We use information from investment networks before making investment decision as well as validating the information that our service providers deliver. The information is also used in the evaluation of the company as well as specific engagement activities.

- (I) Information provided directly by affected stakeholders or their representatives

Provide further detail on how your organisation used these information sources:

- (J) Social media analysis

Specify:

Provide further detail on how your organisation used these information sources:

- (K) Other

Specify:

Provide further detail on how your organisation used these information sources:





Indicator ID <b>PGS 50</b>	Dependent on:	<b>PGS 47</b>	Sub-section <b>Human rights</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

**PUBLIC**

- (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

Describe:

- (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

Describe:

- (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

Explain why:

Our focus is to have the companies responsible for the negative human right outcomes and if needed give access to remedy.

## Minimum Requirements Confirmation

We, the reporting organisation, confirm that we have read and understood the minimum requirements for investor signatories to the Principles for Responsible Investment, relating to indicators PGS 1, PGS 8, PGS 11 and PGS 12, and confirm that the information we have reported on these indicators is true and accurate.

Confirm response to these indicators

Indicator ID <b>SAM 1</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>External investment managers</b>	PRI Principle <b>4</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?

**PUBLIC**

*Answer options refer to external investment managers' responsible investment policies and the practices that your organisation considers relevant for decision making in their assessment.*

	(1) Listed equity (active)	(5) Private equity	(7) Infrastructure
<b>Organisation</b>			
(A) Commitment to and experience in responsible investment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) Responsible investment policy(ies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Governance structure and senior-level oversight and accountability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>People and Culture</b>			
(D) Adequate resourcing and incentives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) Staff competencies and experience in responsible investment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Investment Process</b>			
(F) Incorporation of material ESG factors in the investment process	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) Incorporation of risks connected to systematic sustainability issues in the investment process	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Stewardship</b>			
(I) Policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(J) Policy(ies) or guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(K) Use of stewardship tools and activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(M) Involvement in collaborative engagement and stewardship initiatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(N) Engagement with policy makers and other non-investee stakeholders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(O) Results of stewardship activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Performance and Reporting</b>			
(P) ESG disclosure in regular client reporting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(Q) Inclusion of ESG factors in contractual agreements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>SAM 2</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Service providers</b>	PRI Principle <b>4</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

**PUBLIC**

- (A) Incorporation of their responsible investment policy into advisory services
- (B) Ability to accommodate our responsible investment policy
- (C) Level of staff's responsible investment expertise
- (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
- (E) Other

Specify:

- (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
- (G) Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers

Indicator ID <b>SAM 3</b>	Dependent on:	<b>OO 5.2, OO 21</b>	Sub-section <b>Pooled funds</b>	PRI Principle <b>4</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

If you invest in pooled funds, describe how you incorporate responsible investment aspects into the selection, appointment and/or monitoring of external investment managers.

**PUBLIC**

	<b>Provide example(s) below</b>
(A) Selection	When selecting external investment managers, Nykredit considers the manager's ability to create value and benefit society. This approach extends to their investments. Prior to selection, the investment manager's investment process is analysed, including its alignment with Nykredit's policy.
(B) Appointment	The investment manager will be requested to be a signatory to UNPRI.
(C) Monitoring	Following the appointment of an investment manager, Nykredit regularly monitors developments in terms of sustainability risks, adverse impacts and climate footprints. This is part of the ongoing dialogue with the investment manager, and we share the information with clients. Nykredit's exclusion list is implemented for these funds, and Nykredit will engage with companies if they violate international norms. Nykredit exercises its voting rights for the funds' equity positions.

Indicator ID <b>SAM 4</b>	Dependent on:	<b>OO 12, OO 21</b>	Sub-section <b>Responsible investment practices</b>	PRI Principle <b>General</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>SAM 5, SAM 6, SAM 7</b>			

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

**PUBLIC**

- (A) Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year
- (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year
- (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM

Provide details on the captive relationship: (Voluntary)



Indicator ID <b>SAM 9</b>	Dependent on:	<b>OO 14, OO 21</b>	Sub-section <b>Responsible investment practices</b>	PRI Principle <b>4</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

**PUBLIC**

*Answer options refer to the actions your organisation has undertaken when monitoring external investment managers during the reporting year.*

	(1) Listed equity (active)	(5) Private equity	(7) Infrastructure
<b>Organisation</b>			
(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>People and Culture</b>			
(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Investment Process</b>			
(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Performance and Reporting</b>			
(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(J) Inclusion of ESG factors in contractual agreements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>SAM 11</b>	Dependent on:	<b>OO 14, OO 21</b>	Sub-section <b>Responsible investment practices</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Describe an innovative practice you adopted as part of monitoring your external investment managers' responsible investment practices in a specific asset class during the reporting year.

**PUBLIC**

Indicator ID <b>SAM 12</b>	Dependent on:	<b>OO 14, OO 21</b>	Sub-section <b>Responsible investment practices</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?

**PUBLIC**

	<b>(1) Listed equity (active)</b>	<b>(5) Private equity</b>	<b>(7) Infrastructure</b>
(A) At least annually	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Less than once a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) On an ad hoc basis	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Indicator ID <b>SAM 13</b>	Dependent on:	<b>OO 8, OO 21</b>	Sub-section <b>Stewardship</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' stewardship practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

**PUBLIC**

	(1) Listed equity (active)	(5) Private equity	(7) Infrastructure
(A) Any changes in their policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) The degree of implementation of their policy(ies) or guidelines on stewardship	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) How they prioritise material ESG factors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) How they prioritise risks connected to systematic sustainability issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) Their investment team's level of involvement in stewardship activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(F) Whether the results of stewardship actions were fed back into the investment process and decisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) Whether they used a variety of stewardship tools and activities to advance their stewardship priorities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(H) The deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(I) Whether they participated in collaborative engagements and stewardship initiatives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(J) Whether they had an active role in collaborative engagements and stewardship initiatives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(K) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(L) We did not monitor our external investment managers' stewardship practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>SAM 15</b>	Dependent on:	<b>OO 14, OO 21</b>	Sub-section <b>Engagement and escalation</b>	PRI Principle <b>4</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Describe how your organisation engaged with external investment managers to improve their responsible investment practices during the reporting year.

**PUBLIC**

During the reporting year, we engaged with our external investment managers, Sands and Harding Loevner, to ensure that their responsible investment practices were in line with our sustainable investment policy. Furthermore, we engaged with them to make sure that they were in the final stages of implementing the Sustainable Finance Disclosure Regulation (SFDR) requirements.

Indicator ID <b>SAM 16</b>	Dependent on:	<b>OO 14, OO 21</b>	Sub-section <b>Engagement and escalation</b>	PRI Principle <b>4</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers' responsible investment practices?

**PUBLIC**

	(1) Listed equity (active)	(5) Private equity	(7) Infrastructure
(A) Engagement with their investment professionals, investment committee or other representatives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) Notification about their placement on a watch list or relationship coming under review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>SAM 17</b>	Dependent on:	<b>OO 14, OO 21</b>	Sub-section <b>Verification</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?

**PUBLIC**

*Checking might include reviewing documentation related to verification or auditing.*

	<b>(1) Listed equity (active)</b>	<b>(5) Private equity</b>	<b>(7) Infrastructure</b>
(A) We checked that the information reported was verified through a third-party assurance process	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) We checked that the information reported was verified by an independent third party	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) We checked for evidence of internal monitoring or compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Indicator ID <b>LE 1</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Materiality analysis</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

**PUBLIC**

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, our investment process incorporates material governance factors	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>LE 2</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Monitoring ESG trends</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

**PUBLIC**

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, we have a formal process that includes scenario analyses	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, we have a formal process, but it does not include scenario analyses	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(B) Yes, we have a formal process but it does not include scenario analysis - Specify: (Voluntary)

Indicator ID <b>LE 3</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

**PUBLIC**

	<b>(1) Active - quantitative</b>	<b>(2) Active - fundamental</b>
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>LE 4</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

**PUBLIC**

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> <li><input type="radio"/> (3) in a minority of cases</li> </ul>
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors	<ul style="list-style-type: none"> <li><input type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) in all cases</li> <li><input type="radio"/> (2) in a majority of cases</li> </ul>

	<input type="radio"/> (3) in a minority of cases	<input type="radio"/> (3) in a minority of cases	<input type="radio"/> (3) in a minority of cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>LE 5</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in portfolio construction</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

**PUBLIC**

The exact way we utilise ESG information and monitor our investments varies by asset class and investment strategy. There are commonalities across all funds and products. However, an actively managed fund, selecting individual equities after detailed analysis, is naturally different from a quantitatively managed fund that systematically builds portfolios, or a passive fund designed to track the returns of an index.

As a baseline, across all funds, all holdings and potential investments are screened on a rolling basis for compliance with international norms in the areas of human rights, labour rights, the environmental and climate. This includes widely recognised UN conventions: the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, The Paris Agreement and conventions concerning controversial weapons. This information is used to inform both investment decisions and our stewardship programme. Some companies may be excluded as a result. We also monitor the broader ESG performance of our investments, including relevant measures of climate footprints.

For our passively managed index strategies, the primary consideration is to replicate the performance of a specific index. Some of these indices are constructed on the basis of sustainability considerations, while others do not include this aspect. Regardless, monitoring of companies and stewardship play an important role.

For our actively managed, quantitative strategies, securities are selected via systematic quantitative processes, and the underlying data considered in these processes include ESG information.

For our actively managed, fundamental strategies, ESG information is integrated in both qualitative and quantitative ways throughout the entire investment process, from screening and analysing potential new investments, to calculating fair values, to making investment decisions, building and monitoring portfolios, and informing our stewardship activities.

Indicator ID <b>LE 6</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in portfolio construction</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

**PUBLIC**

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>





Indicator ID <b>LE 7</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Passive investments</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

**PUBLIC**

*Examples might include coverage of an aspect of a portfolio construction process or a specific application.*

The passively managed fund tracks a benchmark which in addition to screening out companies involved in various norms or unethical business activities, takes material ESG factors into consideration. The benchmark takes its starting point in MSCI ACWI, and screens out companies with involvement in e.g weapons, tobacco and alcohol production. It then selects the top 50% index weight based on ESG rating on a sector and regional neutral basis. Among these constituents a Paris Aligned Benchmark (PAB) methodology is applied that among other criteria reduces CO2 intensity by 50% compared to MSCI ACWI and subsequently applies a 7% decarbonization trajectory year on year, with a starting point as of end 2019. The final weight is then based on an objective of reducing tracking error towards MSCI ACWI. ESG and thereby climate objects significantly influences the outcome of the final benchmark and thus also the passively managed portfolio, which tracks the benchmark.

Indicator ID <b>LE 8</b>	Dependent on:	<b>OO 19, OO 21</b>	Sub-section <b>Passive investments</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

How does your organisation select the ESG index(es) or benchmark(s) for your passive listed equity assets?

**PUBLIC**

- (A) We commission customised indexes

Explain:

We commission customised indexed through our index provider, MSCI.

- (B) We compare the methodology amongst the index providers available

Explain:

We do an in-depth analysis of different methodologies amongst the index providers available and compare the different options.

- (C) We compare the costs of different options available in the market

Explain:

We do take this factor into consideration. However, our main focus is on (A) and (B).

- (D) Other

Specify and explain:



Indicator ID <b>LE 9</b>	Dependent on:	<b>OO 17.1 LE, OO 21</b>	Sub-section <b>ESG risk management</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

**PUBLIC**

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator ID <b>LE 10</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG risk management</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

**PUBLIC**

	(1) Active - quantitative	(2) Active - fundamental
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	<input type="checkbox"/>	<input type="checkbox"/>
(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process	<input type="checkbox"/>	<input type="checkbox"/>

Indicator ID <b>LE 11</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Performance monitoring</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

**PUBLIC**

*Through an example, explain your approach to incorporating ESG factors and the link to financial returns of the relevant assets, sectors, or asset classes.*

Nykredit believes that investing sustainably is inseparable from our aim of delivering strong long-term risk-adjusted investment returns.

Nykredit will make principle-based decisions on exclusions of companies, for example, if these do not respect international norms or agreements. These decisions are based on our values and do not take the return potential of the company into consideration. In spite of this, it is our experience that Nykredit will be able to deliver competitive returns on our investments. This is due to the fact that these exclusions contribute to reducing sustainability risks over time, even though this was not the primary rationale for the exclusion. This could be the case of a coal mining company excluded due to not having any transition plan, and then later this company experiences a decline in demand as a result of the green transition. Another case could be the divestment of a sanctioned company, which experiences limitations to its business due to the sanctions.

Indicator ID <b>LE 12</b>	Dependent on:	<b>OO 17 LE, OO 21</b>	Sub-section <b>Disclosure of ESG screens</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

**PUBLIC**

*Signatories should refer to the information shared publicly or privately (only when the assets are covered by commercial or client agreements preventing public disclosure) for all their listed equity assets where ESG screens are applied alone or in combination with other strategies.*

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our listed equity assets subject to ESG screens

Indicator ID <b>FI 1</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Materiality analysis</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, our investment process incorporates material governance factors	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Indicator ID <b>FI 2</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Monitoring ESG trends</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, we have a formal process that includes scenario analyses	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, we have a formal process, but does it not include scenario analyses	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(B) Yes, we have a formal process, but it does not include scenario analyses - Specify: (Voluntary)

Indicator ID <b>FI 3</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) We incorporate material environmental and social factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(B) We incorporate material governance-related factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Indicator ID <b>FI 4</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>FI 6</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

**PUBLIC**

	(1) SSA	(2) Corporate
(A) We incorporate it into the forecast of financial metrics or other quantitative assessments	<input type="radio"/> (1) for all of our AUM <input checked="" type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input checked="" type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) We make a qualitative assessment of how material ESG factors may evolve	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) We do not incorporate significant changes in material ESG factors	<input type="radio"/>	<input type="radio"/>

Indicator ID <b>FI 7</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

At what level do you incorporate material ESG factors into the risks and/or returns of your securitised products?

**PUBLIC**

- (A) At both key counterparties' and at the underlying collateral pool's levels

Explain: (Voluntary)

- (B) At key counterparties' level only

Explain: (Voluntary)

- (C) At the underlying collateral pool's level only

Explain: (Voluntary)

Indicator ID <b>FI 8</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in portfolio construction</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> </ul>

	<input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Indicator ID <b>FI 11</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG risk management</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How are material ESG factors incorporated into your portfolio risk management process?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> <li><input type="radio"/> (2) for a majority of our AUM</li> <li><input type="radio"/> (3) for a minority of our AUM</li> </ul>
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (1) for all of our AUM</li> </ul>



	<input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM	<input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Indicator ID <b>FI 12</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG risk management</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

**PUBLIC**

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Indicator ID <b>FI 14</b>	Dependent on:	<b>OO 5.3 FI, OO 21</b>	Sub-section <b>Performance monitoring</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

**PUBLIC**

*Through an example, explain your approach to incorporating ESG factors and the link to financial returns of the relevant assets, sectors, or asset classes.*

We have positive view on the utility sector where we are invested in several companies that in our opinion are well positioned to take advantage of the of the long term trend towards net zero carbon emissions. This could be companies like Enel S.p.A. and Iberdrola SA.

Indicator ID <b>FI 18</b>	Dependent on:	<b>OO 17 FI, OO 21</b>	Sub-section <b>Disclosure of ESG screens</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

**PUBLIC**

*Signatories should refer to the information shared publicly or privately (only when the assets are covered by commercial or client agreements preventing public disclosure) for all their fixed income assets where ESG screens are applied alone or in combination with other strategies.*

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our fixed income assets subject to ESG screens

Indicator ID <b>HF 1</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Investment guidelines</b>	PRI Principle <b>1, 4, 6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What activities, practices and/or relationships are covered by your organisation's responsible investment policy(ies) for the majority of your hedge fund assets?

**PUBLIC**

- (A) Our ESG requirements of prime brokers
- (B) Our ESG requirements for administrators and custodians
- (C) Our ESG requirements regarding (proxy) voting service providers (or other third-party providers), where applicable
- (D) How breaches in our responsible investment policy are communicated to clients
- (E) How ESG is incorporated into our long and/or short exposures
- (F) Whether sectors, issuers, equities and/or asset types are excluded from the portfolio due to ESG factors
- (G) How we engage with underlying investees, issuers or real assets
- (H) Our responsible investment policy(ies) does not specifically cover activities, practices and/or relationships for our hedge fund assets

Indicator ID <b>HF 2</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Materiality analysis</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your hedge fund strategies?

**PUBLIC**

	<b>(3) Long/short credit</b>
(A) Yes, our investment process incorporates material governance factors	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) Yes, our investment process incorporates material ESG factors into risk assessment and the risk profile of the underlying exposures	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	<input type="radio"/>
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	<input type="radio"/>

Indicator ID <b>HF 3</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>Monitoring ESG trends</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your hedge fund strategies?

**PUBLIC**

	<b>(3) Long/short credit</b>
(A) Yes, we have a formal process that includes scenario analyses	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Yes, we have a formal process but it does not include scenario analyses	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(C) We do not have a formal process for our hedge fund strategies; our investment professionals monitor and review the implications of changing ESG trends at their discretion	<input type="radio"/>
(D) We do not monitor and review the implications of changing ESG trends on our hedge fund strategies	<input type="radio"/>

(B) Yes, we have a formal process but it does not include scenario analyses - Specify: (Voluntary)

Indicator ID <b>HF 4</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How does your investment research incorporate material ESG risks and opportunities into the selection of listed companies or issuers of corporate debt?

**PUBLIC**

	<b>(3) Long/short credit</b>
(A) We incorporate material governance-related risks and opportunities that may affect the products and services delivered by listed companies or issuers of corporate debt	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(B) We incorporate material environmental and social risks and opportunities that may affect the products and services delivered by listed companies or issuers of corporate debt	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(C) We incorporate material environmental and social risks and opportunities that may arise from how listed companies or issuers of corporate debt undertake their operations	<input checked="" type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(D) We incorporate material environmental and social risks and opportunities linked to a listed company or issuer or corporate debt supply chain	<input type="radio"/> (1) in all cases <input checked="" type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases
(E) Other	<input type="radio"/> (1) in all cases <input type="radio"/> (2) in a majority of cases <input type="radio"/> (3) in a minority of cases



(F) Our investment research does not incorporate material ESG risks and opportunities into the selection of listed companies or issuers of corporate debt	<input type="radio"/>
(G) Not applicable, our strategy does not invest directly in listed companies or issuers of corporate debt	<input type="radio"/>

Indicator ID <b>HF 5</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in research</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Where you invest in commodities or other asset classes, either directly or through other financial instruments, provide an example of how you incorporate material ESG factors into your research, investment strategy, engagement or portfolio construction.

**PUBLIC**

Indicator ID <b>HF 6</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in portfolio construction</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

**PUBLIC**

	<b>(3) Long/short credit</b>
(A) Material ESG factors contribute to the selection of individual assets and financial instruments within our portfolio construction and/or benchmark selection process	<input checked="" type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets and financial instruments within our portfolio construction and/or benchmark selection process	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input checked="" type="radio"/> (3) for a minority of our AUM
(C) Material ESG factors contribute to the sector, country or regional weighting of assets and financial instruments within our portfolio construction and/or benchmark selection process	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input checked="" type="radio"/> (3) for a minority of our AUM
(D) Material ESG factors contribute to determining the construction of short positions	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input checked="" type="radio"/> (3) for a minority of our AUM
(E) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	<input type="radio"/> (1) for all of our AUM <input type="radio"/> (2) for a majority of our AUM <input type="radio"/> (3) for a minority of our AUM

(F) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

Indicator ID <b>HF 7</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG incorporation in portfolio construction</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

Describe how information or data on material ESG factors influenced weightings and portfolio construction in each of your main hedge fund strategies during the reporting year.

**PUBLIC**

Internally managed hedge fund strategies	Example
(C) Long/short credit	<p>In the internally managed hedge fund strategies ESG consideration serves as a fundamental part of the process. ESG information is integrated into the entire investment process, from screening and analysing potential new investments, to valuation, making investment decisions, building and monitoring portfolios, and informing about our stewardship activities.</p> <p>Good governance is assessed through analysis as part of our investment selection, dialogue with companies, analysis of shareholder meeting agendas in the context of exercising voting rights and monitoring governance-related data from external ESG data providers. In particular, with respect to sound management structures, staff relations, remuneration of staff and tax compliance.</p>

Indicator ID <b>HF 8</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG risk management</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

What compliance processes do you have in place to ensure that your hedge fund assets subject to negative exclusionary screens meet the screening criteria?

**PUBLIC**

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens
- (E) Not applicable; we do not conduct negative exclusionary screening on our hedge fund assets

Indicator ID <b>HF 9</b>	Dependent on:	<b>OO 21</b>	Sub-section <b>ESG risk management</b>	PRI Principle <b>1</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

For the majority of your hedge funds, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

**PUBLIC**

	<b>(3) Long/short credit</b>
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual securities, issuers and financial instruments	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other securities, issuers and financial instruments exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	<input checked="" type="checkbox"/>
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	<input checked="" type="checkbox"/>
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their own discretion	<input type="radio"/>
(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process	<input type="radio"/>

Indicator ID <b>SO 1</b>	Dependent on:	<b>PGS 48</b>	Sub-section <b>Setting targets on sustainability outcomes</b>	PRI Principle <b>1, 2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>SO 2, SO 2.1, SO 3</b>			

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

**PUBLIC**

List up to ten of these specific sustainability outcomes.

- (A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name



NZAM commitment

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(B) Sustainability outcome #2

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(C) Sustainability outcome #3

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(D) Sustainability outcome #4

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(E) Sustainability outcome #5

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(F) Sustainability outcome #6

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(G) Sustainability outcome #7

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(H) Sustainability outcome #8

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(I) Sustainability outcome #9

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name



(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(J) Sustainability outcome #10

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

Indicator ID <b>SO 2</b>	Dependent on:	<b>SO 1</b>	Sub-section <b>Setting targets on sustainability outcomes</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>SO 2.1, SO 4, SO 5</b>			

For each sustainability outcome, provide details of up to two of your nearest-term targets.

**PUBLIC**

*Providing at least a target name is necessary to unlock subsequent indicators in the module.*

*Targets may be non-measurable (i.e. qualitative) or measurable (i.e. quantitative). They may be set as part of long-term planning or result from ongoing monitoring or due diligence aiming to identify your new and ongoing, actual and potential, and positive and negative sustainability outcomes.*

	<b>(A1) Sustainability Outcome #1: Target details</b>
(A1) Sustainability Outcome #1:	NZAM commitment
(1) Target name	Carbon intensity reduction 60%
(2) Baseline year	2020
(3) Target to be met by	2030
(4) Methodology	We use the TCFD-recommended methodology on carbon intensity.
(5) Metric used (if relevant)	CO2e/mio. sales
(6) Absolute or intensity-based (if relevant)	<input type="radio"/> (1) Absolute <input checked="" type="radio"/> (2) Intensity-based
(7) Baseline level or amount (if relevant):	24
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	<input checked="" type="radio"/> (1) Yes <input type="radio"/> (2) No

Indicator ID <b>SO 2.1</b>	Dependent on:	<b>SO 1, SO 2</b>	Sub-section <b>Setting targets on sustainability outcomes</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

For each sustainability outcome, provide details of up to two of your long-term targets.

**PUBLIC**

	<b>(1) Target name</b>	<b>(2) Long-term target to be met by</b>	<b>(3) Long-term target level or amount (if relevant)</b>
<b>(A1) Sustainability Outcome #1:</b>  NZAM commitment	Carbon intensity reduction 60%	2050	Net zero 2050

Indicator ID <b>SO 3</b>	Dependent on:	<b>SO 1</b>	Sub-section <b>Focus: Setting net-zero targets</b>	PRI Principle <b>General</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>SO 3.1, SO 3.2, SO 3.3</b>			

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

**PUBLIC**

*The content of this indicator is based on the reporting requirements of the Net-Zero Asset Owners Alliance (NZAOA) and/or the Net-Zero Asset Managers Initiative (NZAM).*

- (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
- (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets

Indicator ID <b>SO 4</b>	Dependent on:	<b>SO 2</b>	Sub-section <b>Tracking progress against targets</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>SO 4.1</b>			

Does your organisation track progress against your nearest-term sustainability outcomes targets?

**PUBLIC**

*Provide details on your nearest-term targets only. Targets may be non-measurable (i.e. qualitative) or measurable (i.e. quantitative).*

	<b>(A1) Sustainability outcome #1:</b>
(A1) Sustainability outcome #1:	NZAM commitment
Target name:	Carbon intensity reduction 60%
Does your organisation track progress against your nearest-term sustainability outcome targets?	<input checked="" type="radio"/> (1) Yes <input type="radio"/> (2) No  Explain why not:

Indicator ID <b>SO 4.1</b>	Dependent on:	<b>SO 4</b>	Sub-section <b>Tracking progress against targets</b>	PRI Principle <b>1</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

**PUBLIC**

*Provide details on your nearest-term targets only. Targets may be non-measurable (i.e. qualitative) or measurable (i.e. quantitative).*

	<b>(A1) Sustainability Outcome #1: Target details</b>
(A1) Sustainability Outcome #1:	NZAM commitment
(1) Target name	Carbon intensity reduction 60%
(2) Target to be met by	2030
(3) Metric used (if relevant)	CO2e/mio. sales
(4) Current level or amount (if relevant)	
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	

Indicator ID <b>SO 5</b>	Dependent on:	<b>SO 2</b>	Sub-section <b>Levers used to take action on sustainability outcomes</b>	PRI Principle <b>1, 2, 5</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>Multiple</b>			

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

**PUBLIC**

- (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets

Select from drop down list:

- (1) Individually  
 (2) With other investors or stakeholders

- (B) Stewardship: engagement with external investment managers

Select from drop down list:

- (1) Individually  
 (2) With other investors or stakeholders

- (C) Stewardship: engagement with policy makers

Select from drop down list:

- (1) Individually  
 (2) With other investors or stakeholders

- (D) Stewardship: engagement with other key stakeholders



Select from drop down list:

- (1) Individually
- (2) With other investors or stakeholders
  
- (E) Capital allocation
- (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

Indicator ID <b>SO 8</b>	Dependent on:	<b>SO 5</b>	Sub-section <b>Stewardship with investees</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

**PUBLIC**

*Signatories can choose whether to report on all outcomes jointly in answer option (A) and/or to provide specific responses about some or all of the sustainability outcomes they are taking action on in answer options (B) to (K).*

	<b>(A) Across all sustainability outcomes</b>
(1) Describe your approach	<p>As a baseline, across all funds, all holdings and potential investments are screened on a rolling basis for compliance with international norms in the areas of human rights, labour rights, the environment and climate. This includes widely recognised UN conventions: UN Global Compact, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, the Paris Agreement and conventions concerning controversial weapons. This information is used to inform both investment decisions and our stewardship programme.</p> <p>Our engagements are usually either direct, collaborative or led by service providers. We often find it can be powerful to combine these methods. Generally, we seek to act as constructive partners to our investee companies, and this means we may also bring third parties into the dialogue – for example, liaising between the company and an NGO regarding best practice on the specific issue.</p> <p>The fact that we as investors may vote at general meetings highlights that our investments represent actual ownership of real companies. At Nykredit, we consider the thoughtful and proper exercise of those voting rights on behalf of investors to be one of our core responsibilities as an asset manager. We are committed to providing transparency in both our voting process and our actual voting decisions, which we disclose via our website.</p> <p>Nykredit uses proxy adviser services to assist with operational aspects of voting. These advisers provide research on voting agendas, based on Nykredit's defined policies and principles for voting. This information is supplemented with other data and own research used in our investment processes. Our active investment teams play a key role in this process, with voting being an important element in the stewardship of the investments. In the active, fundamental investment strategies, the investment team will analyse agendas against this policy and in the context of dialogue or engagement with the holdings assess how best to vote. Concurrently, Nykredit's ESG team reviews agendas across investment strategies, assessing</p>

	<p>them against this policy and other exposures. This is done by systematic analysis of agendas by our proxy advisor based on the principles in this policy combined with a more qualitative internal analysis of AGMs selected due to the size of holdings or controversy that demands extraordinary attention.</p>
<p>(2) Stewardship tools or activities used</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> (1) Engagement</li> <li><input checked="" type="checkbox"/> (2) (Proxy) voting at shareholder meetings</li> <li><input type="checkbox"/> (3) Filing of shareholder resolutions or proposals</li> <li><input type="checkbox"/> (4) Nominating directors to the board</li> <li><input type="checkbox"/> (5) Leveraging roles on the board or board committees (e.g. nomination committees)</li> <li><input type="checkbox"/> (6) Taking roles on investee boards</li> <li><input type="checkbox"/> (7) Working directly with portfolio companies and/or real asset management teams</li> <li><input type="checkbox"/> (8) Litigation</li> <li><input type="checkbox"/> (9) Other</li> </ul>
<p>(3) Example</p>	<p>During 2022, we continued our work engaging with banks on climate targets. Our aims are to encourage 1.5°C aligned target setting for financed emissions. Recognizing not only the importance of long-term targets, but for urgent short-term action, we urge prompt setting of appropriate targets and pathways for the financing of higher-emitting sectors. We consider both the rigour and scope of targets. While it is increasingly common for banks to have targets related to lending activity, we are encouraging clearer commitments related to capital market financing. Our focus with the banks is on encouraging real world emissions reductions, both through helping their clients transition, and reducing financing of activities incapable of transition. While some banks are more advanced than others, our engagement is broad-based, recognizing that this is a sector-wide issue. The engagement also links closely with our voting activity. The AGM season saw many banks with climate-related shareholder resolutions, and/or Say-on-Climate proposals introduced by the banks themselves, and in such situations, we generally voted in a manner supporting a robust approach to climate. Progress on this issue is generally incremental, with additional policy statements and funding commitments introduced by some of the banks during the year.</p> <p>Furthermore, Nykredit has for several years engaged with the steel manufacturer Arcelormittal on climate risks and other issues. Primary steel manufacturing is extremely carbon intense, but the material is crucial for infrastructure development, and specifically for transition related infrastructure. In 2022, progress includes the first (limited) shipments of green steel flat products in Spain.</p>
<p><b>For specific sustainability outcomes:</b></p>	
	<p><b>(B) Sustainability Outcome #1:</b></p>
<p>(B) Sustainability Outcome #1:</p>	<p>NZAM commitment</p>

(1) Describe your approach	
(2) Stewardship tools or activities used	<input type="checkbox"/> (1) Engagement <input type="checkbox"/> (2) (Proxy) voting at shareholder meetings <input type="checkbox"/> (3) Filing of shareholder resolutions or proposals <input type="checkbox"/> (4) Nominating directors to the board <input type="checkbox"/> (5) Leveraging roles on the board or board committees (e.g. nomination committees) <input type="checkbox"/> (6) Taking roles on investee boards <input type="checkbox"/> (7) Working directly with portfolio companies and/or real asset management teams <input type="checkbox"/> (8) Litigation <input type="checkbox"/> (9) Other
(3) Example	

Indicator ID <b>SO 9</b>	Dependent on:	<b>SO 5</b>	Sub-section <b>Stewardship with investees</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

**PUBLIC**

*The content of this indicator is based on the reporting requirements of the Net-Zero Asset Owners Alliance (NZAOA) and/or the Net-Zero Asset Managers Initiative (NZAM).*

*Ranking options: 1 = most important, 4 = least important.*

(A) We prioritise the most strategically important companies in our portfolio.

*For example, signatories may prioritise the companies in their portfolio with the most wide-ranging influence over other companies, policy makers, or other stakeholders.*

Describe how you do this:

By 2030, 100% of invested funds should be aligned with, aligning with, or subject to engagement to encourage alignment with, a 1.5° C pathway.

Select from the list:

- 2
- 4

(B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.

*For example, signatories may engage with at least 20 of their highest-emitting investee companies or with companies in sectors known for widespread poor working conditions.*

Describe how you do this:

Through active ownership of high-emission companies to encourage alignment with a 1.5° C pathway.

Select from the list:

- 1
- 4

(C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.

*For example, signatories may engage with companies that cover at least 65% of financed emissions in their portfolio or with 100% of portfolio companies operating in conflict and high-risk areas.*

Describe how you do this:

Through active ownership

Select from the list:

- 3
- 4

(D) Other

Describe:

Select from the list:

- 4



Indicator ID <b>SO 10</b>	Dependent on:	<b>OO 5, SO 5</b>	Sub-section <b>Stewardship with external investment managers</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, how did your organisation, or the external service providers acting on your behalf, engage with external investment managers to ensure that they take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

**PUBLIC**

*Explain how your organisation engaged with external investment managers during the selection, appointment and/or monitoring process to this end.*

*Signatories can choose whether to report on all their outcomes jointly in answer option (A) and/or to provide specific responses about some or all of the sustainability outcomes they are taking action on in answer options (B) to (K).*

	<b>(A) Across all sustainability outcomes</b>
(1) Describe your approach	<p>When selecting external investment managers, Nykredit considers the manager's ability to create value and benefit society. This approach extends to their investments. Prior to selection, the investment manager's investment process is analysed, including its alignment with Nykredit's sustainable investment policy.</p> <p>We incorporate ESG factors when monitoring external investment managers. During the reporting year, we engaged with our external investment managers, Sands and Harding Loevner, to ensure that their responsible investment practices were in line with our sustainable investment policy.</p>
<b>For specific sustainability outcomes:</b>	
	<b>(B) Sustainability Outcome #1:</b>
(B) Sustainability Outcome #1:	NZAM commitment
(1) Describe your approach	



Indicator ID <b>SO 13</b>	Dependent on:	<b>SO 5</b>	Sub-section <b>Stewardship: Collaboration</b>	PRI Principle <b>2</b>	Type of Indicator <b>PLUS</b> VOLUNTARY TO DISCLOSE
	Gateway to:	<b>N/A</b>			

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

**PUBLIC**

*These collaborative initiatives may be focused on stewardship with investees, external investment managers, policy makers or other key stakeholders. Provide up to four examples.*

	<b>(A) Initiative #1</b>
(1) Name of the initiative	Climate Action 100+ engagement
(2) Indicate how your organisation contributed to this collaborative initiative	<input checked="" type="checkbox"/> (A) We were a lead investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (C) We publicly endorsed the initiative <input type="checkbox"/> (D) We provided pro bono advice, research or training <input type="checkbox"/> (E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support <input type="checkbox"/> (F) We provided financial support <input type="checkbox"/> (G) We were part of an advisory committee or similar <input type="checkbox"/> (H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report) <input type="checkbox"/> (I) Other
(3) Provide further detail on your participation in this collaborative initiative	As an example, under Climate Action 100+, Nykredit is part of the group responsible for engagement with Maersk and Heidelberg Cement. Both companies have set ambitious climate targets. We previously participated in the CA100+ engagement with Philips, which has now ended. We also participate in other collaborative initiatives, with NZEI and IAHR participation from 2023.
	<b>(B) Initiative #2</b>
(1) Name of the initiative	
(2) Indicate how your organisation contributed to this collaborative initiative	<input type="checkbox"/> (A) We were a lead investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (C) We publicly endorsed the initiative <input type="checkbox"/> (D) We provided pro bono advice, research or training

	<input type="checkbox"/> (E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support <input type="checkbox"/> (F) We provided financial support <input type="checkbox"/> (G) We were part of an advisory committee or similar <input type="checkbox"/> (H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report) <input type="checkbox"/> (I) Other
(3) Provide further detail on your participation in this collaborative initiative	
	<b>(C) Initiative #3</b>
(1) Name of the initiative	
(2) Indicate how your organisation contributed to this collaborative initiative	<input type="checkbox"/> (A) We were a lead investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (C) We publicly endorsed the initiative <input type="checkbox"/> (D) We provided pro bono advice, research or training <input type="checkbox"/> (E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support <input type="checkbox"/> (F) We provided financial support <input type="checkbox"/> (G) We were part of an advisory committee or similar <input type="checkbox"/> (H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report) <input type="checkbox"/> (I) Other
(3) Provide further detail on your participation in this collaborative initiative	
	<b>(D) Initiative #4</b>
(1) Name of the initiative	
(2) Indicate how your organisation contributed to this collaborative initiative	<input type="checkbox"/> (A) We were a lead investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies) <input type="checkbox"/> (C) We publicly endorsed the initiative <input type="checkbox"/> (D) We provided pro bono advice, research or training <input type="checkbox"/> (E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support <input type="checkbox"/> (F) We provided financial support <input type="checkbox"/> (G) We were part of an advisory committee or similar

	<input type="checkbox"/> (H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report) <input type="checkbox"/> (I) Other
(3) Provide further detail on your participation in this collaborative initiative	

Indicator ID <b>CBM 1</b>	Dependent on:	<b>N/A</b>	Sub-section <b>Approach to confidence-building measures</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>Multiple indicators</b>			

How did your organisation verify the information submitted in your PRI report this reporting year?

**PUBLIC**

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- (H) We did not verify the information submitted in our PRI report this reporting year

Explain why:

Indicator ID <b>CBM 6</b>	Dependent on:	<b>CBM 1</b>	Sub-section <b>Internal review</b>	PRI Principle <b>6</b>	Type of Indicator <b>CORE</b>
	Gateway to:	<b>N/A</b>			

Who in your organisation reviewed the responses submitted in your PRI report this year?

**PUBLIC**

- (A) Board, trustees, or equivalent

Sections of PRI report reviewed

- (1) the entire report  
 (2) selected sections of the report

- (B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

- (1) the entire report  
 (2) selected sections of the report

- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

## Minimum Requirements Confirmation

We, the reporting organisation, confirm that we have read and understood the minimum requirements for investor signatories to the Principles for Responsible Investment, relating to indicators PGS 1, PGS 8, PGS 11 and PGS 12, and confirm that the information we have reported on these indicators is true and accurate.

Confirm response to these indicators

## Submission

You have reached the final submission page.

**To close and submit your 2023 PRI report click "Confirm" at the bottom of the page. A confirmation email will be sent to the user from your organisation who submits your report.**

**You will not be able to amend your responses after the reporting cycle closes.**

I confirm I have reviewed my response and it is complete and correct. I understand I will not be able to amend my answers after the reporting cycle closes.